

Akira v. Conceptant, *et. al.*
Motion for Summary Judgment

Non-Confidential Portion

Deposition of
Eli Liang



Planet Depos®
We Make It *Happen*™

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Date: February 6, 2018

Case: Akira Technologies, Inc. -v- Conceptant, Inc., et al.

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

-----x
AKIRA TECHNOLOGIES, INC., :
Plaintiff, : Civil Action No.:
v. : 1:17cv00412 (LO/IDD)
CONCEPTANT, INC., :
et al., :
Defendants. :

-----x

CONFIDENTIAL INFORMATION REDACTED

Deposition of ELI LIANG
Falls Church, Virginia
Tuesday, February 6, 2018
1:53 p.m.

Job No: 174865

Pages: 1 - 244

Reported by: Kelly Carnegie, CSR, RPR

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

2

1 Deposition of ELI LIANG, held at the offices
2 of:

3
4
5
6 Randolph Law, PLLC
7 252 North Washington Street
8 Falls Church, Virginia 22046
9 (703) 652-3039
10
11
12
13
14

15 Pursuant to Notice, before Kelly Carnegie,
16 Certified Shorthand Reporter, Registered
17 Professional Reporter, and Notary Public in and
18 for the Commonwealth of Virginia.
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

3

1 A P P E A R A N C E S

2 ON BEHALF OF THE PLAINTIFF:

3 CHRISTOPHER R. SHIPLETT, ESQUIRE

4 Randolph Law, PLLC

5 252 North Washington Street

6 Falls Church, Virginia 22046

7 (703) 652-3039

8

9

10 ON BEHALF OF THE DEFENDANTS:

11 PETER C. COHEN, ESQUIRE

12 Charlson Bredehoft Cohen & Brown, P.C.

13 11260 Roger Bacon Drive

14 Suite 201

15 Reston, Virginia 20190

16 (703) 318-6800

17

18

19

20

21

22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

4

1	C O N T E N T S		
2	EXAMINATION OF ELI LIANG		PAGE
3	By Mr. Cohen		6
4	E X H I B I T S		
5	(Exhibits attached to the transcript.)		
6	LIANG DEPOSITION EXHIBITS		PAGE
7	Exhibit 1	May 9, 2016 E-mail	
8		Pipeline Report	
9		AKIRA0068626 - AKIRA0068638	70
10	Exhibit 2	June 3, 2016 E-mail	
11		Pipeline Report	
12		AKIRA0007690 - AKIRA0007691	78
13	Exhibit 3	September 14, 2012 E-mail	96
14	Exhibit 4	June 13, 2012 E-mail Chain	115
15	Exhibit 5	Broad Agency Announcement	
16		FDABAA-17-00123N	
17		DEF010858	117
18	Exhibit 6	At-Will Employment Agreement	
19		AKIRA0000002 - AKIRA0000005	119
20	Exhibit 7	Akira Technologies, Inc.	
21		Employment Agreement	
22		AKIRA0060034 - AKRIA0060047	124

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

5

1	E X H I B I T S C O N T I N U E D		
2	Exhibit 8	Skype Chat	
3		DEF008787	196
4	Exhibit 9	October 2, 2012 E-mail Chain	
5		AKIRA0007724 - AKIRA0007728	203
6	Exhibit 10	Defendant Andrey Mikhhalchuk's	
7		Answer to First Amended	
8		Complaint, Affirmative Defenses,	
9		and Counterclaim	215

10

11

12 CONFIDENTIAL PORTIONS:

13 70:9 - 242:3

14

15

16

17

18

19

20

21

22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

6

1 P R O C E E D I N G S

2 Whereupon,

3 ELI LIANG

4 being first duly sworn or affirmed to testify to
5 the truth, the whole truth, and nothing but the
6 truth, was examined and testified as follows:

7 EXAMINATION BY COUNSEL FOR THE DEFENDANTS

8 BY MR. COHEN:

9 Q Good afternoon, sir. How are you?

10 A Fine. Thank you.

11 Q What is your full name?

12 A Eli Entze Liang. E-l-i, middle name
13 E-n-t-z-e, and Liang.

14 Q And have you ever been deposed before?

15 A Yes.

16 Q How long ago?

17 A A year and a half maybe. I don't know
18 exactly.

19 Q Was that in connection with some lawsuit
20 against Akira?

21 A It was in connection with a lawsuit that
22 Akira --

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

7

1 Q Okay.

2 A -- was making.

3 Q My name is Peter Cohen. I represent the
4 defendants in this case. If at any time today I
5 ask you a question that you don't understand, by
6 all means speak up and I'll do my best to rephrase
7 it so that you do understand it, okay?

8 A Yes.

9 Q You and I have to be verbal, audible for
10 obvious reasons, so the court reporter can take
11 down my questions and can take down your answers,
12 correct?

13 A Yes.

14 Q Okay. And you and I should do the best
15 we can not to talk over one another, me with my
16 questions, you with your answers, so that the
17 court reporter can take everything down in an
18 orderly fashion, okay?

19 A Yes.

20 Q You do understand that you're under oath
21 to tell the truth?

22 A Yes.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

8

1 Q Are you under any medication that would
2 make it difficult for you to recall events?

3 A No.

4 Q Do you have any medical condition that
5 would make it difficult for you to testify today?

6 A No.

7 Q Okay. Where do you presently work?

8 A I work at Akira Technologies.

9 Q When did you start there?

10 A May of 2011.

11 Q And you worked continuously at Akira
12 from May --

13 A Let me correct that.

14 Q Sure.

15 A We were in discussions from May. I
16 actually don't know technically when I started.
17 It might have been June.

18 Q All right. Of 2011?

19 A Yes, but of 2011.

20 Q Between then and the present, did you
21 work continuously at Akira?

22 A Yes, I did.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

9

1 Q And when you came on Akira, in what
2 position?

3 A I came on as chief operating officer.

4 Q And is that what you are today?

5 A I am president now.

6 Q Have you held any other positions other
7 than chief operating officer and president?

8 A Not with respect to title, no.

9 Q Okay. All right. When you came on as
10 COO, what were your duties?

11 A My duties were business development and
12 developing the government business, also
13 reorganizing the company and structuring it for
14 bidding on government business and, you know,
15 other kinds of business development activities.

16 Q When did you become president?

17 A I'm not sure, but it was at least two or
18 three years ago.

19 Q All right. In 2016 were you the
20 president?

21 A This is 2017.

22 Q This is 2018.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

10

1 A I could have been. 2018. Beginning of
2 2018. Let's see. One year ago. I'm not sure.
3 I'm not sure, but I could have been the president
4 then.

5 Q Okay. Did you --

6 A If you say 2014, then I'd know I wasn't
7 president in 2014.

8 Q What about 2015?

9 A Even worse. I'm not sure because I've
10 essentially had similar duties even though my
11 title changed.

12 Q Okay. Did your duties change when you
13 went from COO to president?

14 A I would say a number of my operational
15 duties went away and I had, I would say, more
16 business development duties. That's how I'd
17 characterize that change.

18 Q All right. What were your duties as --
19 in connection with business development? And if
20 that has changed over time since 2011, let me know
21 that.

22 A My business development duties have

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

11

1 always been to identify opportunities, to
2 cultivate staff, to also identify opportunities,
3 to develop opportunities, to perform bids and
4 proposal, B&P, which is developing proposals,
5 talking with customers, and positioning ourselves
6 from -- because we're a small company, it also
7 involves positioning ourselves to be able to win
8 business. Some of that positioning is building
9 teams, coming up with strategies for, let's say,
10 obtaining customers, obtaining contracts. I think
11 those probably include most of it. I did mention
12 proposals, right?

13 Q Yes, you did, B&P.

14 A Yeah. It all comes down to that.

15 Q Okay. Throughout your entire time with
16 Akira, have you reported directly to the CEO?

17 A Yes.

18 Q What's his full name?

19 A Srinivas Chennamaraja.

20 Q If I refer to him as the CEO or Akira's
21 CEO --

22 A Yes.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

12

1 Q -- will you know who I'm referring to?

2 Am I correct in saying that Akira only
3 goes after federal government opportunities, it
4 doesn't go after private sector opportunities?

5 A That is not completely true.

6 Q Okay. Have there been instances where
7 -- during the time you've been with Akira where
8 Akira has gone after private sector opportunities?

9 A We've gone after state opportunities.

10 Q State government?

11 A State government opportunities and --
12 well, just a second.

13 Q Sure.

14 A Yes, and we've gone after private sector
15 opportunities. We had -- and in fact, I might
16 actually be closing on an opportunity in the next
17 period of time involving a -- some water
18 development.

19 Q Okay. Is it correct to say that Akira
20 devotes a predominant amount of its time --

21 A That is correct. Sorry.

22 Q That's okay.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

13

1 MR. SHIPLETT: Wait until he's finished
2 the question.

3 THE WITNESS: I anticipated the
4 question. I apologize.

5 MR. COHEN: You don't know how I'm going
6 to finish that question.

7 THE WITNESS: Okay.

8 BY MR. COHEN:

9 Q Am I correct in saying that during --
10 during your time with Akira, it has predominantly
11 spent its time going after federal government
12 opportunities?

13 A Yes.

14 Q This water development, is that a
15 commercial opportunity?

16 A It is a commercial opportunity, but for
17 a foreign government.

18 Q For a foreign government? Okay. All
19 right. Is this the only commercial opportunity
20 that you can tell me about during your tenure at
21 Akira?

22 A We have pursued a number of commercial

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

14

1 opportunities which, as you may be aware, involve
2 a less formal procedure as pursuing government --
3 federal government opportunities and even state
4 and local government opportunities. And this is
5 the only one of those opportunities which has
6 reached a significant stage, which still may not
7 close. We may not win it, but it is at a
8 significant stage.

9 Q Has Akira, as far as you know, ever
10 pursued a private sector or commercial opportunity
11 in the health care area?

12 A Yes. This water development one is
13 health care.

14 Q How so?

15 A Because water is one of the key factors
16 in health in African nations. If you can
17 consider -- water is generally considered water
18 and sanitation. It's one of the pillars. In
19 Africa you have things like malaria, child -- you
20 know, childhood development, education, and water
21 is always one of the key pillars.

22 Q Let's focus on Akira's pursuit of

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

15

1 federal government opportunities. You had
2 mentioned that identifying such opportunities was
3 or is a part of business development. Can you
4 explain that piece of business development.

5 A Yes. So business development is
6 composed of a number of, I would say, distinct
7 activities, and one of them is really an activity
8 that I would characterize as intelligence.
9 Another activity is customers, okay?
10 Intelligence, customers.

11 There are a number of others, but with
12 respect to your particular question, business
13 development involves identifying the opportunity
14 through intelligence, meaning talking to various
15 people, understanding that there's a need.

16 There's also customers, I said, which is
17 talking to the customer to -- and I see this as
18 distinct from intelligence because here you
19 already have usually intelligence of opportunity
20 and you're letting the customer know that you
21 could actually perform that particular need that
22 you've already discovered.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

16

1 Now, sometimes that process is
2 commingled because you're talking to the customer
3 to introduce yourself, and then the customer
4 introduces an opportunity. So in that case it
5 would be a case of both intelligence and customer
6 kind of commingled together.

7 But, you know, many times it's distinct
8 because you really shouldn't be visiting your
9 customer until you actually know, understand
10 something about what they do, because you don't
11 want to actually just, you know, be wide-eyed and
12 say what do you do? We can do anything, you know.
13 Is there something we can help you with?

14 So usually the intelligence comes first,
15 understanding the opportunity, possible
16 opportunities. Oftentimes it involves identifying
17 one of the many possibilities as something that
18 you would like to pursue, and then going and
19 trying to visit the customer, sit in front of him,
20 show that you know about this kind of technology
21 or that particular opportunity, that you can help
22 them in this thing, and ask the customer to

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

17

1 basically talk more.

2 So this is a little bit of an
3 identification process. I don't really see
4 identification as kind of a distinct phase. As I
5 said, I see it more as a mingling of the
6 intelligence and customer.

7 Q Okay. As part of the BD development
8 process, how does -- how does Akira go about
9 gathering intelligence about opportunities?

10 A We often look on various sites like FBO.
11 There are industry websites. Like, for example,
12 there's an industry group around federal health IT
13 that publishes, you know, things that may be
14 coming.

15 We use Deltek where we can look and the
16 Deltek company has a, you know, particular
17 database where you can look up opportunities that
18 are about ready to come to a recompetes stage,
19 because oftentimes the pattern in federal
20 government is when a contract is let, then after
21 five years, because of various, let's say,
22 mandates in Congress and whatnot, the contract

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

18

1 usually comes to an end and then a new -- let's
2 say there's an opportunity for new vendors to bid
3 so that you don't have from a, let's say,
4 structural perspective, you don't have the same
5 company that's locked into a contract and then
6 other companies don't have the same opportunity.

7 So because of that kind of, I would say,
8 structure that the federal government has, looking
9 in these databases like Deltek allow you to see
10 what happened before, and in this case what
11 happened before is a predictor of what could
12 happen in the future. And then when you see those
13 kinds of opportunities and you say, oh, this
14 contract comes to an end in -- let's say toward
15 the end of 2018, then there's an automatic
16 presumption that toward the beginning of 2018 to
17 middle, there may be a solicitation coming out for
18 a recompetition on that opportunity.

19 But Deltek is a major source of
20 competitive intel that's broad. Then there's more
21 specific intelligence gathering, which is
22 concerning specific agencies and, you know, going

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

19

1 in.

2 And here's where we try to leverage some
3 of our own employees, because -- and this also
4 explains why many government contractors that are
5 small concentrate on only a few agencies, a few --
6 you know, a few agencies, a few maybe even
7 segments of agencies, because that is a very
8 resource intensive aspect. It requires you
9 actually having feet on the ground there. And so
10 if we have a contract already with, you know, a
11 particular, let's say, agency or part of an
12 agency, then we do have feet on the ground there
13 and we ask people that are employees to listen.
14 And then, you know, we have various ways in which
15 we try to encourage them to listen for what's
16 happening.

17 We've certainly encountered cases -- I
18 don't remember anything offhand -- but where --
19 and this is why we kind of develop this. We had
20 certainly cases where we found out later that
21 opportunities have come out of areas where we had
22 employees, but our employees didn't tell us about

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

20

1 those opportunities because they didn't -- they
2 didn't think that we -- they just didn't associate
3 that maybe the company I work for might want to
4 bid on this thing, you know.

5 So keeping that in mind, we've been
6 really kind of focused on trying to have our
7 employees that are on the ground for various
8 employers listen for things that come out that
9 might be in our wheelhouse, if you will, that
10 might be things that we might actually be able to
11 do.

12 Q Well, you mentioned one database, the
13 FBO.gov site.

14 A Yes.

15 Q I think you mentioned another one.

16 A Deltek.

17 Q Deltek. And then there was a health IT
18 website, I think you mentioned.

19 A Yes. I'm not recalling exactly the
20 website name, but it is for the -- it's like
21 Federal Health IT Forum or something like that. I
22 get a subscription through my e-mail --

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

21

1 Q Right.

2 A -- from that website. They literally I
3 think once a week send me some e-mail of various
4 things that have happened, including boards. So
5 they'll say the Veterans Health Administration
6 just awarded XYZ company this contract, or they'll
7 say this particular opportunity has just come out
8 as an opportunity.

9 And we have pursued a number of
10 opportunities because they were published on that
11 site where they'll say, for example, this
12 particular multi-award contract -- I remember one
13 that we teamed with a company called Vector at
14 VHA. It's a health IT -- well, VHA is mostly
15 health. This was a VA level, but again, VHA,
16 Veteran Health Administration, is probably the
17 largest part of Department of Veteran Affairs.
18 And so it did come out on this particular website
19 and we were -- we had our attention brought to it
20 by that, and it was a multi-award contract.

21 So then we started working on teaming,
22 which is another aspect of business development,

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

22

1 and we look for teams who could -- where the prime
2 could actually bid, and we got on a successful
3 team. And as a result, our prime contract was
4 awarded -- our partner company there was awarded a
5 contract, which is still in protest right now, but
6 that's just an example of seeing these
7 opportunities that appear on that particular
8 website --

9 Q All right. Is there --

10 A -- whose name --

11 Q I'm sorry.

12 A -- I've forgotten, whose name I've
13 forgotten.

14 Q Is there a more specific website for --
15 do you know what IT-70 is?

16 A Yes.

17 Q What is that?

18 A It is a federal supply schedule for
19 information technology services, products and
20 services.

21 Q Is it part of the setaside program?

22 A No, it is not.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

23

1 Q No? Okay.

2 A There are setasides that can be had
3 under that vehicle.

4 Q Okay. All right. Does Akira qualify
5 under any of these contract vehicles to seek
6 business?

7 A Yes.

8 Q Which vehicles?

9 A We qualify under every vehicle that we
10 hold to seek business under that vehicle.

11 Q Yeah. What vehicles?

12 A Federal supply schedule 70.

13 Q Anything else?

14 A Navy SeaPort-e. I'm not sure I can list
15 all of them we have. There are a lot of vehicles.

16 Q Just do your best.

17 A Okay. FirstSource II for the DHS. GSA
18 8(a) STARS. NITAAC CS, CIO-CS. NASA SEWP V.
19 Navy SPAWAR PBX. There's probably at least six or
20 seven more that I'm straining at. U.S. Patent
21 Service IT. I think it may be called ITS or
22 something.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

24

1 But these are vehicle contracts, okay?
2 Some of them are -- I should mention are what are
3 called government-wide acquisition contracts.
4 Some of them are -- I don't know what the current
5 name is, but I think of them as agency-wide
6 acquisition contracts where just -- it's just for
7 a certain agency and -- or department and they buy
8 underneath that, and you can have multiple awards
9 from different parts of that agency or department.

10 There are I'm sure six or seven more,
11 and I just don't remember the names.

12 Q And does Akira have to qualify for these
13 contract vehicles?

14 A Yes. We have to bid for them and we
15 have to be qualified.

16 Q And if you do qualify, does it provide
17 Akira with any type of advantage or benefits?

18 A Yes.

19 Q What?

20 A The advantage is that -- well, the
21 advantage is similar to the advantage for the
22 government. The advantage for the government is

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

25

1 that it preselects a set of qualified bidders for
2 a certain type of work, which is why they go
3 through the trouble of doing evaluation award of
4 these vehicle contracts.

5 Then the advantage for the vendors is, I
6 would say, kind of the other side of that, very,
7 very closely associated, which is that it means
8 that there are less competitors because the
9 government has already preselected. It's less
10 likely that you will have, you know, 50 to 100
11 bidders bidding for the contract, only those who
12 had it on their mind to bid for the contract at
13 the time, the vehicle contract at the time that it
14 was being let, that it was being solicited.

15 Another advantage is that sometimes the
16 proposal is simpler, the evaluation process,
17 because, for example, on some of these contracts,
18 they check past performance and corporate
19 experience at the vehicle level when they're
20 awarding the vehicle contract. And then when
21 you're actually bidding on individual task orders
22 or delivery orders, they already presume that, you

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

26

1 know, their parent contracting office has already
2 done their homework by virtue of the fact that you
3 were awarded this contract, you do have adequate
4 past performance, suitable -- suitable corporate
5 experience in order to carry out the work, so they
6 don't need to check that. They just ask for your
7 solution and they can just judge your solution,
8 which oftentimes means a quicker evaluation
9 process also where the government in some of the
10 cases of these contracts can even award within
11 days, you know, where the solicitation -- and
12 usually in such a case, it's because it's lowest
13 price technically acceptable, which is LPTA.
14 They'll come out and they'll say, okay, give us an
15 acceptable solution. If you have the lowest
16 price, then we award, and we don't need to check
17 your past performance or corporate experience.
18 That has already been done at the vehicle level.

19 So in such a case, you know, it's
20 possible that they can even check that you have a,
21 let's say, technically acceptable solution in a
22 day or two, and then they can very quickly rank

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

27

1 the price of all those that have technically
2 acceptable solutions and very quickly pick the one
3 with the lowest price.

4 So we've certainly seen on some of these
5 vehicle contracts awards within, you know, even
6 two or three days of when solicitations are sent
7 in. So that's a clear advantage. When we don't
8 have a vehicle contract, we've had cases where
9 contracts were not awarded for even up to three
10 years.

11 Q Is that in the full and open space?

12 A We typically have not been bidding full
13 and open. We have in the past bid a few. Most of
14 them are still -- that we're bidding, the vast
15 majority are still setaside in one category or
16 another. And even so, they can take years to
17 award, and that's if there are no protests.

18 Q And you're saying that can even happen
19 in the setaside space?

20 A That even happens in the setaside space.

21 Q But if I'm hearing you right, one of the
22 benefits to a qualified entity under these

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

28

1 contract vehicles is that they can compete with a
2 smaller pool of competitors?

3 A Yes.

4 Q Okay. Whereas full and open is open to
5 everyone?

6 A In theory it's open to everyone.
7 Obviously you have to qualify. One of the ways
8 the government tries to select the pool is, again,
9 using vehicle contracts, but for larger
10 businesses, like Alliant is a famous one, there
11 are some -- you know, a few others which allow
12 them to just, again, reduce the number of
13 proposals they have to evaluate.

14 I think the government sometimes uses it
15 as -- you know, uses the word "efficient", that
16 it's as well -- in order to have -- to be able to
17 efficiently evaluate proposals, meaning not to
18 evaluate 200 proposals, we're going to establish
19 the minimum criteria or go/no-go kind of thing.

20 Contracts like Alliant allow them to
21 start off with a smaller pool, and then they can
22 apply some criteria to try to get fewer proposals,

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

29

1 which, presumably, and this is our going
2 assumption usually, is that the government is
3 being open, that if you qualify, you will -- you
4 can win a proposal. If anyone believes that not
5 to be the case, then you usually don't bid on such
6 an opportunity.

7 Q All right. Has -- during your time with
8 Akira, has it ever bid in the full and open space?

9 A Yes.

10 Q But am I correct in saying it's
11 predominantly in the contract vehicle setaside
12 space?

13 A I would say it has recently been
14 predominantly in the contract vehicle space. We
15 have bid on -- we used to bid mostly on FBO.gov,
16 which is called open market, okay, in the full and
17 open space -- well, let me distinguish it, okay?

18 Open market means that it's not under a
19 vehicle, okay? So you were kind of distinguishing
20 as full and open and contract vehicle. That's not
21 really the distinction.

22 The distinction is contract vehicles,

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

30

1 okay, or open market. As open market, you can
2 still have setasides and you can have full and
3 open, okay? So full and open, open market, is
4 actually a kind. You can also have setasides,
5 which are open market.

6 Now, the distinction is when it's open
7 market, each of the contracting agencies, their
8 contracting officer is awarding you a contract
9 directly unless it is an 8(a) contract, okay? And
10 that's a special condition which I can explain on
11 that.

12 So in the past we bid a number of open
13 market opportunities, and FBO.gov is probably the
14 most well known of the open market federal
15 government opportunity websites. There are
16 additional ones, like FedBid.com is one, even
17 though there's a .com on it, and, you know, GSA
18 now has an auction site. And the difference being
19 that there is no contract vehicle, there is no
20 terms that you've already agreed to like a master
21 set of terms. If you win something on those, then
22 the government has to establish a direct contract

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

31

1 with you with the exception of 8(a), okay? But a
2 direct contract with you, and that contract has to
3 include all the terms of that particular
4 agreement, okay, between you to provide and them
5 to be -- to provide, too.

6 From that perspective, as I said, we
7 used to do a huge amount of going to FBO.gov. The
8 only reason that we started doing less of that is
9 because our revenues increased, and for some of
10 our NAICS codes that we traditionally would go
11 after we were no longer able to compete as prime
12 contractors against -- to compete as prime
13 contractors for those types of contracts, okay?

14 So in other words, a contract would come
15 out. It would be, let's say, you know, 8(a)
16 setaside. Our 8(a) actually expired in 2015,
17 November, so we couldn't prime it. In that case
18 we would usually have to go find a prime
19 contractor. But usually prime contractors, as I
20 said, with the whole business development aspect,
21 if they haven't done the intelligence, if they
22 haven't talked to the customer, it becomes a crap

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

32

1 shoot.

2 And from that, it doesn't really make
3 sense for us to identify an opportunity to be a
4 subcontractor, find a prime contractor who would
5 actually have to leave the thing and have them ask
6 you, well, what is this, you know, and what are we
7 bidding in, and it's not clear that they would be
8 well positioned.

9 So I'm not saying we haven't done it.
10 We have done that kind of thing. But oftentimes
11 when we do that, we have to be prepared to spend a
12 lot of money, and we're basically spending money
13 for the prime contractor to do all the business
14 development that they never did because they
15 didn't know about the opportunity until we told
16 them.

17 So because of that, we have to be
18 selective in now doing those kinds of
19 opportunities. We could go for full and open, and
20 we sometimes do depending on the opportunity. But
21 with full and open, you're competing against a
22 broader set of potential bidders, so it becomes a

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

33

1 matter of, let's say, marshalling resources. You
2 know, if you have limited business development
3 resources and capacity, then you're looking at
4 which opportunities can result in a higher return
5 on investment.

6 Q Okay. Does Akira -- when it identifies
7 an opportunity, what is sort of the next step in
8 the process that Akira takes after a particular
9 business opportunity is identified?

10 A Well, as I said before, there's an
11 intelligence, which is -- and then talking to the
12 customer. Then there's the strategy. We have to
13 develop a strategy around this.

14 A strategy involves things like teaming
15 and some other things like this, you know, are we
16 going to go after this as a prime, are we going to
17 go after this as a sub. What do we even have to
18 offer the customer? Is there anything of unique
19 value? How should we pursue this? How many times
20 do we call the customer? Do we take a meeting
21 with the customer or try to get one? Do we -- you
22 know, do we work with potential subcontractors or

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

34

1 partners now well before the opportunity comes out
2 to build a team that where we could even visit the
3 customer?

4 So again, this is somewhat tied to what
5 I said earlier about intelligence and customer,
6 okay? So you have intelligence, strategy,
7 customer, team, you know, assembly of the team.
8 There is initiating -- well, clearly there are
9 various proposal steps, you know, of actually --
10 and this is when you're getting closer. Even --
11 we sometimes have to kick off the proposal process
12 well before the solicitation comes out, because
13 oftentimes in solicitation, they give you 21 to 30
14 days to respond, and if you actually start working
15 on it the day the solicitation is released, then
16 your return on investment drops because your
17 probability of winning the contract is
18 significantly lower.

19 In the government contracting space, we
20 often tend to think that the incumbents have
21 already written their proposals before the
22 solicitation comes out because they're sitting on

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

35

1 the contract, they know that the recompete is
2 happening and they position their resources and
3 they think about what it is that the customer
4 wants, and so they have this -- almost this
5 natural advantage. They know -- and they
6 sometimes know the work better than the customer
7 can explain in a limited number of pages in the
8 statement of work or performance work statement.
9 So, you know, there's that.

10 There's also developing the solution,
11 and this is distinct from the strategy because the
12 strategy is a strategy. It's around, you know,
13 high level, you know, how do we approach this.
14 What do we do from that perspective? Solution is
15 more tactics, okay? It's about, you know, for
16 this particular opportunity, what are we going to
17 offer the government? We're going to offer A, B,
18 and C, okay, but we're not going to offer D. And
19 how do we combine A, B, and C to make it look
20 attractive because other people are going to offer
21 -- many of them will also offer A, B, and C.

22 So it becomes development of the

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

36

1 solution. And when I say solution, it has -- I
2 see it as a particular term of art because when we
3 say solution in government contracting, at least,
4 it's a little different than what I think the
5 broader public -- let's say my wife or whatever --
6 would think of it as a solution. A solution is
7 something that, you know, solves something, and it
8 has that same effect in government contracting,
9 but it could include a bunch of things like, for
10 example, a solution could involve bidding specific
11 people on a contract because those people have
12 experience in that agency or those people are
13 known by agency personnel.

14 So the solution is not just a technical
15 construction, but it is essentially the entire
16 technical approach of a proposal that you would
17 bid, okay?

18 And so now I'm already -- I've already
19 slid way into proposal development when you
20 started asking about business development. So I'm
21 done.

22 Q That's fine.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

37

1 Was it part of your role to go to these
2 databases to look for opportunities?

3 A Yes. I was the main person that did
4 this.

5 Q You were what?

6 A I was the main person that did it.

7 Q Okay. And did the CEO also look at
8 these databases to identify opportunity?

9 A I would say he did that more in the most
10 recent years. In the first -- from around 2011 to
11 around 2014, I did it mostly, and he probably did
12 like a smaller -- much smaller percentage at the
13 time.

14 I think that in the most recent times
15 he's been more aware of what is passing the
16 databases, more aware of what is coming out on the
17 health -- you know, this health -- federal health
18 IT website that I mentioned. And part of that
19 is -- and I'm not in the place to give reasons,
20 but we've kind of segmented between he and I the
21 duties in the company. His was more focused on
22 operations and I was, as I explained, more focused

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

38

1 on business development, and now it's gotten more
2 muddled.

3 Now, this didn't mean that there weren't
4 certain opportunities that were close to his heart
5 or that he was aware of because from his
6 operational duties, one of the key operational
7 duties he had was actually managing the contracts
8 we would win. So I was focused on winning
9 contracts, he was focused on operating them.

10 And as I said, one of the key things
11 that -- one of the key reasons why small
12 businesses oftentimes focus on a very small number
13 of agencies is because the -- you know, the feet
14 on the street or the people that you have within
15 the agency are a critical resource to that
16 business development in the sense that, you know,
17 you want to hear what they hear. You want them to
18 raise opportunities up.

19 So oftentimes in his management,
20 operational duties managing these contracts, the
21 people feed him information about an opportunity,
22 which he can then like meet with the customer even

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

39

1 as, let's say, not a proposer, not a potential
2 vendor, but actually as an existing vendor. He
3 would meet the customer and, hi, you know, we're
4 delivering for you on this contract, but by the
5 way, you know, can we talk about this other thing?

6 So that gave you kind of a unique
7 position because in the business development area,
8 one of the hardest things to do is get meetings
9 with potential clients. The government knows that
10 they could send these things out for bid and
11 anyone can bid, so a lot of people don't see a lot
12 of reason to meet potential vendors. They say,
13 we'll publish the solicitation and anyone can bid
14 on it, so why should we meet?

15 Q Well, when you got there in 2011 and
16 beyond, did others aside from yourself have the
17 responsibility to identify business opportunities
18 for Akira?

19 A I think that others have identified some
20 opportunities. I am now thinking back on what we
21 have actually won, and there have been some that
22 Srini has identified that we have won at VHA, and

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

40

1 most of these as a subcontractor. But of all the
2 contracts that we have won on the services side,
3 and I would -- I would specifically say that
4 because at some point in our past, like -- I think
5 it was around 2013, we started a value-added
6 resale business that sold products --

7 Q The VAR?

8 A The VAR, which sold products and
9 services. That has a shorter sales cycle, and I'm
10 less aware of exactly the opportunities that come
11 up unless they're over a certain size, okay?

12 From that perspective, on the services
13 side, which is delivering labor services, for the
14 most part, this was a long preamble to saying no,
15 I do not believe that we have won any contracts on
16 the services side that I can remember which I did
17 not first identify. There were opportunities that
18 were identified by Srini, the CEO. There were
19 opportunities identified by various employees,
20 but -- and we pursued probably a good number of
21 those opportunities, but at the end, we weren't
22 awarded.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

41

1 Q But my question was slightly different.

2 A Okay.

3 Q I mean, putting aside being awarded the
4 contract, did others other than you and the CEO,
5 did -- were others tasked with the responsibility
6 of looking at the databases and identifying
7 business opportunities?

8 A Yeah. We did ask -- we asked all of our
9 employees who had time to look at those databases
10 in the areas in which they worked. We freely gave
11 that out because, you know, we always had the hope
12 that somebody would identify an opportunity which
13 we could actually win.

14 Obviously had we known that no one
15 could, we wouldn't have done that. When I say
16 could, I mean from the perspective of actually
17 winning work, okay? They could. You can look at
18 something and if the result is not, let's say,
19 favorable, and in this space it means winning a
20 contract and actually being able to perform the
21 work and getting paid for it, actually getting
22 paid is an important part of that, then I don't

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

42

1 consider that a success.

2 And so yes, we did ask employees -- in
3 fact, all employees -- to look at databases. Some
4 agreed. Some actually refused. Some refused.
5 Some did not feel that it was part of their job to
6 do other than what they felt they were hired to
7 do.

8 Q Well, take the FDA. During the time
9 that you've been there, let's say between 2011 and
10 the end of 2016, did anyone within Akira have the
11 responsibility of identifying business
12 opportunities emanating from the FDA?

13 A It was a shared responsibility. We had
14 a lot of employees that were -- in fact, by the
15 way, most of our services employees -- not most.
16 I would say there were points in our history when
17 most, meaning over 50 percent, of our services
18 employees were at the FDA.

19 And so we asked -- we would ask a number
20 of people to look -- that were among our FDA
21 employees to look for these opportunities, and we
22 would freely give out access to the web, for

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

43

1 example, the Deltek databases and things like
2 that, so that they could have the opportunity to
3 look.

4 It was very, very mixed in result.
5 Sometimes there would be employees that would find
6 over a short period of time even 100
7 opportunities, and then there would be -- usually
8 they would get busy or something and there would
9 be no follow-up. So they would be added to
10 like -- we have a pipeline, okay? We have a
11 pipeline tool now and we used to have a pipeline
12 tool. They would like add opportunities to the
13 pipeline and then, you know, as -- I would say
14 like speculative opportunities as things to maybe
15 explore in the future, and then there would be no
16 further exploration.

17 So we've always encouraged this. And I
18 have to say as the one with the primary business
19 development responsibility, I've been very
20 disappointed. I know there are companies that
21 have done it well like Booz Allen where Booz Allen
22 makes it the responsibility of the employees to

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

44

1 develop business and pays them. I do not believe
2 we do it as well as Booz Allen, and we've tried.

3 Q Are there any individuals that come to
4 mind -- well, strike that.

5 I understand what you're saying about
6 that you encouraged employees to be on the
7 look-out for opportunities.

8 A Uh-huh.

9 Q My question was slightly different, and
10 that is between 2011 and 2016, were there any
11 employees of Akira that was tasked with the
12 specific duty or responsibility to bring business
13 opportunities from the FDA to Akira's attention
14 other than yourself?

15 A We've asked employees. We've not
16 required it. So, for example, we asked Joshua
17 Phipps to look for opportunities at FDA. It
18 was -- when you say tasked, you know, I'm just
19 thinking, okay, does task mean that we required
20 him to do it? We did not require him to do it.
21 Did we ask him to do it? Yes, we did ask him to
22 identify opportunities that, you know, he could

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

45

1 find at FDA.

2 Q Anyone else other than Josh?

3 A We had asked Lisa Houle to do it. She
4 refused. We had asked a number of the other
5 employees who were in, I would say, high-level
6 positions, high-level meaning like architect-level
7 type positions, an example being like Adapa Prasad
8 who no longer works for us. We've even asked --

9 Q What was his response?

10 A He did. He assisted, but then he left.
11 I mean, he was not with us very long, okay? He
12 was willing to do it. And we even asked
13 subcontractor partners like Bill Lloyd, who has
14 his own company. We did ask him, and he actually
15 helped find a number of opportunities for us to
16 partner.

17 So I would say we've asked. We've never
18 tried to make that a requirement. So that's --
19 that's what I would say in response to your
20 tasks.

21 Q Well, speaking about Josh, I mean, did
22 Akira depend -- well, did Akira's success in

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

46

1 generating business opportunities from the FDA,
2 did it depend on Josh identifying opportunities?

3 A No.

4 Q Okay.

5 A No. The reason I would say that is I
6 really wish it depended on Josh because we hired
7 him to be the director of our health practice, and
8 as director of the health practice, your job is to
9 make that practice grow.

10 I look at it and I say that in the past,
11 I didn't find opportunities with some exceptions.
12 Like, for example, I did not identify the CFSAN
13 opportunity. In fact, I never really learned a
14 lot about it, and that was a sole source. So
15 somebody identified it. It could have been Josh.
16 It could have been somebody else. I just happen
17 to have no knowledge of -- really of that
18 particular opportunity at all.

19 Aside from -- and then there was an
20 opportunity, actually, now that I recall, for the
21 Center for Tobacco Products which I also did not
22 identify, but it was brought to me actually by a

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

47

1 contracting officer, and then we had a contract.
2 So I guess I can't count that one as something
3 that I developed.

4 But other than those two at FDA, I
5 identified all the opportunities. Now, I put -- I
6 would say put into a separate category the
7 follow-on business, because the way that in our
8 government contracting business goes, a lot of
9 follow-on business is -- it's never wired, but
10 it's -- you win follow-on business through good
11 performance of your current contract. So if
12 you're performing on your current contract, your
13 contract ends in two years, if you perform well,
14 then oftentimes if the customer can find a legal
15 or contractual way to do it, they will give you
16 the follow-on business.

17 And sometimes they can't because of
18 certain, you know, maybe small business goals or
19 some other things that occur. But usually that's
20 the case. That's almost kind of the going
21 principle, that -- and so from that particular
22 perspective, I cannot say that I was responsible

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

48

1 for any of the follow-on business directly for the
2 ORA contract, okay? But for first-won FDA
3 business, I have been responsible for all of that
4 business with the exceptions that I mentioned,
5 okay?

6 And I wish -- and Josh was not there for
7 the first contract that we had at ORA, but I
8 really wish that I could say that he was
9 responsible for all the rest, but he wasn't. We
10 wanted that to be the case.

11 Q Okay. What was Josh's primary duties at
12 Akira if it wasn't that?

13 A His primary duty was actually to work --
14 well, okay. There was a time when he became
15 part-time on his primary duty, and I'll explain
16 his primary duty in a second. He was 50 percent
17 billable, but I think it was only in the last year
18 he was with us. And then if he was 50 percent
19 billable, then that other 50 percent should have
20 been spent doing certain kinds of business
21 development.

22 I think -- okay. This would have

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

49

1 been -- see, now I've forgotten the date that Josh
2 left Akira, but it would have been in his last
3 year there when we cut him to 50 percent on his
4 main client contract. And so prior to that point,
5 his 100 percent real job was performing his duties
6 as assigned on the contract site.

7 Q Was that the FDA ORA BIT contract?

8 A It was the FDA ORA BIT contract and the
9 follow-on, okay?

10 Q All right.

11 A And during a certain time, that was the
12 SBIR contract, FDA SBIR, okay? So it was FDA BIT,
13 then FDA SBIR, then FDA -- something like bits or
14 bis or something like that, and then there was a
15 follow-on contract for that.

16 And so that was his primary duty. His
17 secondary duty of course was we -- as I said, for
18 all of our employees at FDA, we said please keep
19 your eyes open, hear about things that -- if you
20 hear about things that we can potentially pursue,
21 let us know and we can try to work on, you know,
22 pursuing those kinds of opportunities.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

50

1 In the most recent one year, as I said,
2 that Josh worked for us, there was a time that he
3 was cut down to about half, but then I was told by
4 Josh that the customer still ended up using him
5 more. So oftentimes we would ask Josh, okay,
6 you're only half-time on this contract, because on
7 paper he's half-time. Why aren't we getting --
8 why aren't you doing this or having this customer
9 meeting and that thing? And he said, that's only
10 on paper. The customer still needs to see me all
11 the time, and when the customer needs me, I have
12 to go to the customer site, I have to go to
13 meetings and stuff like that.

14 So we were told, even though we were
15 only billing for half of his time, that he was
16 effectively almost full-time on that particular
17 contract, even during the time that on paper he
18 was half-time.

19 Then the following year, as I
20 remember -- so, actually, this was already for
21 more than a year because the following year we --
22 yes, that's absolutely true. We bid him

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

51

1 half-time. Then the following year, so this would
2 have been -- just a second. It would have been
3 fall of 2016 to fall of 2017, this most recent
4 contract, and he left partway through that cycle.

5 On that cycle, so this would have been
6 the contract starting around -- I guess it would
7 have been around September 26, 2016, we actually
8 upped him to I think almost full-time again, and
9 the reason we upped him to full-time again was we
10 effectively didn't get anything for our half-time
11 investment the year before.

12 Okay. So now I can give the dates. It
13 was around September 26, 2015, okay, to around
14 September 26, 2016, was the contract where he was
15 half-time. And then we put him on full-time from
16 September -- around September 26 -- hold on --
17 2016 to September 26, 2017. We put him back on
18 full-time, and then only a few months passed, as I
19 recall, and then he left the company. So it would
20 have been right toward I guess the beginning of
21 2017.

22 Q Who made the decision to put him back on

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

52

1 full-time?

2 A Srini and I did.

3 Q Okay. And --

4 A And by the way, part of it was also
5 Josh, because Josh said effectively the client
6 needs me full-time anyway, so just bill me
7 full-time.

8 Q Now, in that late September 2016 time
9 frame, did Lisa become program manager for that
10 contract?

11 A She did, she did. She became program
12 manager. I don't remember the exact
13 circumstances. As I said, I was responsible for
14 business development, Srini was responsible for
15 operations. So many of those personnel changes on
16 the actual operating contract, on the actual
17 executing contract, those were his to make.

18 My understanding was that sometime in
19 the course of that late 2015 to 2016 contract that
20 she was made program manager. Then what we
21 discovered -- and again, I'm not sure if she
22 formally was made program manager. There were

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

53

1 just references, like Srini would say she was
2 program manager or project manager. Because I had
3 no operational responsibilities, even though, you
4 know, I'm president, I was really focusing -- this
5 is out of my own desire. I was really focusing on
6 business development. So in some cases maybe I
7 just didn't pay close attention, whether it was
8 actually told to me that she is formally the
9 program manager.

10 But I know that she had some degree
11 of -- maybe a significant -- she had a significant
12 degree of responsibility on that contract, and
13 that was the way that people treated it, meaning
14 Srini treated her as having that significant
15 responsibility. I just don't know what the actual
16 formality was.

17 Q Was she billing 100 percent on that
18 contract?

19 A Yes, she was billing 100 percent.

20 Q Now, is there a difference between
21 program manager and project manager?

22 A It depends on the customer, and I think

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

54

1 it just depends on the solicitation. We're right
2 now, for example, bidding on a contract where it's
3 a \$25 million contract, and they decided the top
4 person, they meaning the government, decided the
5 top person be called a project manager.

6 We tend to think that -- and this is
7 based more on, I would say, the Project Management
8 Institute, that a program manager has a broader
9 set of responsibilities which involve multiple
10 projects, okay? A project manager deals with one
11 project. However, this is not the way the
12 government typically does it. They just almost
13 randomly pick, which means that sometimes a very
14 small project will have a program manager.

15 We usually do not create our own titles.
16 When we win a contract, we just assign the title
17 the government gives us in the solicitation. So
18 the government says it's a program manager, you're
19 a program manager. And if it's a project manager,
20 then we say you're a project manager, but it's a
21 really big project, so...

22 Q Well, in the context of the FDA ORA BIT

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

55

1 contract, was there a difference between being
2 program manager and project manager?

3 A I don't recall that on the ORA BIT
4 contract we actually even had a project manager.
5 At one point we definitely had a project
6 coordinator, but I do not recall -- because I
7 don't have operational responsibility, I don't
8 recall there was one. And partly this is also
9 based on my knowledge of doing some of the bids.

10 Now, one of the things I should say, I'm
11 responsible and I've been responsible for B&P
12 whether it was called B&P or not for -- since I
13 joined. One of the things that I should say is
14 that I have not been the one to prepare some of
15 these sole source proposals, sole source proposals
16 being when the government has already decided that
17 you're going to be it and you just have to prepare
18 a solution and you have to show them that the
19 price is competitive, okay? But they only go to
20 one vendor, and if you fail, then presumably they
21 can go to somebody else or they can bid it out to
22 a number of companies.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

56

1 So in those cases, a lot of that is, as
2 I mentioned earlier, based on having performed
3 well on your existing contract, and then the
4 government generally sends you a softball, you
5 know, kind of like a solicitation request like,
6 oh, write five pages about, you know, how you're
7 going to perform this, you know. They would have
8 a much more substantial if you were, you know,
9 actually competing with multiple vendors, but here
10 they just have to determine yes, they're
11 technically acceptable and they have a reasonable
12 price.

13 And from that particular perspective, we
14 didn't really need to use our heavy guns, you
15 know, because heavy guns, we're tending to like,
16 okay, we're competing with a whole bunch of
17 horses. You know, when there's only one horse in
18 the race, then we almost feel -- and this may be a
19 little exaggeration -- that we can hand the
20 proposal development task to a secretary and say,
21 okay, cut and paste whatever content is available.

22 So from that perspective, I did not work

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

57

1 on all the proposals. Even from that perspective,
2 a lot of the ORA proposals I did not work on,
3 which means that as a consequence, I do not know
4 all of the job titles or categories. I do know
5 the job categories for the very first proposal we
6 did at ORA, which is the one that we originally
7 hired Josh on back in 2011, late, and I do know
8 the job categories for the most recent one after
9 Josh left, which is late 2017. And in between I
10 think that those were just, you know, again, the
11 secretary proposals. They were just -- you know,
12 were just going from one to another.

13 Q Okay. All right. In all of our
14 discussion about the business opportunities that
15 Akira has pursued during your time with Akira and
16 the mechanisms put in place, I didn't hear any
17 mentioning of broad agency announcements. Has
18 Akira during the time that you've been there ever
19 submitted a bid or proposal in response to a BAA?

20 A Yes, for Navy. Naval Air Command we
21 submitted two -- submitted for two BAAs, and we
22 lost both. We were not the prime, but we

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

58

1 cultivated that with a prime contractor named
2 Green-Gate Technology, Green-Gate Technology. We
3 were the -- we were really the only partner, and
4 we put together, I would say, most of the
5 proposal.

6 Q And when was this? Do you remember the
7 year?

8 A Might have been early 2017.

9 Q 2017?

10 A Uh-huh. It was probably -- yeah, it was
11 that, 2017. We also have responded -- hold on. I
12 don't recollect. I thought we also responded to
13 another one for TSWG, but actually now I'm
14 thinking about it, we were probably preparing the
15 response and we may not have actually submitted,
16 but that would have been for the Technical Support
17 Working Group, TSWG, and a BAA.

18 So we worked on -- okay. So this brings
19 me to the point. We worked on some that we didn't
20 submit for certain reasons, usually based on that
21 we didn't think we would win, because as part of
22 the proposal process, oftentimes we would make go,

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

59

1 no-go decisions. The best is to make it before
2 you actually start any kind of effort.

3 But sometimes you would actually start
4 some effort, and then you just say there's no way
5 we can field a -- it's a viable solution, but no
6 way we can field a competitive solution and it's
7 going to be a waste the rest of the time. And
8 then sometimes -- I just generally hate this, but
9 sometimes we just say let's pull the plug on this
10 and let's move on to something else.

11 Q All right. How about prior to 2017?
12 Did Akira --

13 A Yeah. TSWG -- I'm sorry. I interrupted
14 you.

15 Q That's okay.

16 Prior to 2017, did Akira ever submit a
17 bid or proposal in response to a BAA?

18 A Did we submit? I do not recall.

19 Q Okay.

20 A But I -- but I know we prepared a few,
21 but I do not recall if we submitted. We've
22 prepared -- I'm pretty sure we've prepared well

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

60

1 over a hundred proposals. I would even use a
2 higher number, but I'm not sure. And so one or
3 two of those might have been BAAs.

4 It would never have been much because in
5 general my feeling is that BAAs have a lower win
6 probability. So I -- it wouldn't have been much.
7 However, I do not recall any specific ones, which
8 means that it's possible that there were none that
9 we submitted.

10 Q You mentioned a hundred proposals.

11 A Yes.

12 Q Let me just see if I understand it. If
13 I'm incorrect, let me know. You're estimating
14 that you're --

15 A Estimating.

16 Q Estimating that during the time you've
17 been with Akira, Akira has submitted about around
18 a hundred proposals?

19 A That's my speculation, yes.

20 Q And that would be what? When you began
21 in 2011 to the present?

22 A Yes, from 2011 to the present.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

61

1 Q And of the estimated hundred, two BAA
2 proposals that you can recall in 2017?

3 A Yes.

4 Q Okay. And the BAA -- and the proposals
5 were actually submitted and lost in 2017?

6 A Yes.

7 Q Okay. All right. Why -- when you say
8 that BAAs have low probability, I think was the
9 phrasing you used, what do you mean?

10 A Okay. What I mean is I was with a
11 company called PAC, Pinghu & Associates, and --
12 corporation, I guess, PAC -- and there I had
13 started a government -- a government proposal
14 group. Pinghu was mainly doing consulting in -- I
15 wouldn't say it was the federal space. It was
16 mostly -- the main client was I think Freddie Mac,
17 okay? So pseudo-governmental consulting.

18 But I was brought on board -- I was
19 hired to start a government practice, but some of
20 the partners -- I was not the only one -- they had
21 decided that they had certain relationships to the
22 Defense Department, intelligence industry. This

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

62

1 was sometime after 9/11 when a lot of money was
2 being spent on counterterrorism and antiterrorism.

3 So I mentioned earlier the TSWG, which
4 is the Technical Support Working Group, which is
5 some sort of task force -- I believe it was a task
6 force -- and brought together, you know, the
7 intelligence agencies, brought together Homeland
8 Security and some other groups to develop
9 counterterrorism technologies.

10 So we made what seemed like over a
11 hundred bids, what seemed. Again, a little -- I
12 can't remember exactly. I do recall, for example,
13 that on one BAA we submitted over 20 responses,
14 okay? Might have even been 24. So we made a
15 heavy effort on that. We had one response that
16 developed into, let's say, a full proposal. We
17 had three total responses of all that hundred
18 which developed into white papers.

19 Now, for -- this is not true for all
20 BAAs, but the ones for the TSWG, you went through
21 a phase where you had to submit like a quad chart,
22 which is considered a one-page proposal, and some

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

63

1 other information, and then if they were
2 interested, they would ask you for a white paper,
3 which was limited to a certain number of pages,
4 like maybe ten, 15, something like that. And then
5 if they liked your white paper, then you would be
6 asked for a pull proposal, and then you would be
7 awarded a contract.

8 We never progressed in any of that to
9 being awarded a contract. We had submitted a
10 proposal. We had bid -- had our proposal even
11 accepted, and they said because this is DoD, you
12 have to be audited by the DCAA, the Defense
13 Contracting Audit Agency. Pinghu & Associates
14 failed the audit twice and passed the third time.
15 By the time we passed, which took a long time to
16 do those audits, the customer lost interest and
17 they never progressed to awarding the contract.

18 So I would say this gave me kind of a
19 feeling that based on personal firsthand
20 experience with one particular agency on BAAs that
21 BAAs were not a high probability kind of activity.

22 Q And did you bring that experience with

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

64

1 you into Akira?

2 A I brought that bias into Akira.

3 Q Okay. I mean, during your time with
4 Akira, did you ever want to pursue a BAA?

5 A Yes. I wanted to pursue BAAs that I
6 felt we actually had the particular skills and
7 what they wanted we were a good match for.

8 I didn't want to pursue any of the BAAs
9 that I saw which -- where I felt like we had to
10 assemble a solution. In other words, we ourselves
11 don't have it, let's look for partners, let's look
12 for other technologies that we could offer. I
13 didn't want to do any of that stuff. I wanted to
14 find BAA opportunities where -- which were custom
15 made for us, and there are very few where if they
16 asked for something, we could say, oh, my gosh,
17 this is what we do. Then let's answer, let's make
18 the offer.

19 That happened actually for Naval Air,
20 for one of the two, which was the 2017. The
21 second we kind of had our arm twisted that we were
22 going to answer. But the first one our partner,

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

65

1 Green-Gate, said we have a personal relationship
2 with the CIO there. He's asked us to respond to,
3 you know, this thing. Look at what they require.
4 We looked. We said, oh, my gosh, yeah, we are
5 doing this. Not only are we doing this, this is
6 an area that is computer security, information
7 security, an area that we wanted to develop
8 further.

9 And so we said yes, let's do it, and we
10 essentially -- by the way, Green-Gate is a
11 two-person company, so we essentially had to write
12 the proposal for them because, you know, they were
13 only two and both I think assigned to client work
14 or whatever.

15 So if we had other kinds of
16 opportunities come up like that which were right
17 on target, we would have -- we would have gone
18 after that. I just have not really seen a lot of
19 opportunities like that.

20 Q All right. From 2011 onward, would
21 there be regular business development meetings
22 among Akira employees including yourself?

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

66

1 A 2011 on?

2 Q Onward.

3 A I would say it was extremely spotty in
4 the first years, almost none, okay? When I say
5 first years, maybe through at least 2013, probably
6 2013. From there we would sometimes have regular
7 meetings and we would sometimes not.

8 I would say the last two years, which is
9 from roughly about 2016 until now, we've been very
10 good at this, and the reason -- one of the reasons
11 that we've been very good at having regular weekly
12 meetings is because we actually hired a business
13 development manager. Not hired permanently, but
14 from the outside as a consultant.

15 And this is pure business development
16 apart from just individual accounts and things
17 like this. So this was somebody to help us with
18 our entire process of developing business, and
19 part of that process is having a pipeline of
20 business, reviewing that pipeline, doing
21 prioritization within the pipeline and that sort
22 of thing.

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

67

1 So one of his responsibilities that he
2 charges to us is holding the weekly pipeline
3 meeting, helping everyone to prioritize
4 opportunities for working on those, trying to
5 motivate staff, you know, associate with those
6 opportunities to, you know, talk to the customer
7 or do other things. It was in some of these types
8 of -- some of these pipeline meetings where what
9 you said earlier, you know, where various
10 employees who would attend these pipeline meetings
11 would be encouraged, asked to talk with the
12 customers and, you know, to potentially identify
13 opportunities within their agency.

14 So that was -- that became -- since 2016
15 that became one of the primary business
16 development activities that kind of tied the
17 company together, because we would do that -- I
18 don't remember when it started, but these days
19 it's around 11:00 o'clock on Monday and we just
20 try to keep that up regularly, and part of keeping
21 it up is we actually pay somebody who, you know,
22 bills us when he does it, so he tries to do it

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

68

1 every Monday.

2 Q What's the name of this person?

3 A Michael Handberg.

4 Q Okay. And did he prepare the pipeline
5 reports?

6 A He prepared the pipeline -- since 2016
7 he's prepared the pipeline report.

8 Q Okay. And --

9 A Since about 2016. Again, I'm not -- I
10 don't recall exactly when it started, but I
11 believe it was around 2016.

12 Q So prior to 2016, were there regular
13 business development meetings in 2015?

14 A We've tried to have regular business
15 development meetings for a while. I do believe
16 that under our previous chief operating officer,
17 whose name was Craig Fitzpatrick, he tried to have
18 a few, but they failed to have consistency until
19 we brought aboard Michael Handberg.

20 So that makes it difficult for me to
21 remember because there may have been periods of
22 even up to a month or two months where we would

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

69

1 have meetings, and then those would dissolve and
2 we'd stop having meetings. But we certainly
3 wanted to do it, and one of the reasons that it
4 wasn't consistent is because a lot of the
5 people -- I mean, it ends up being not much of a
6 meeting if it's just Srini and myself.

7 So we've tried to get employees who have
8 boots on the ground at these client sites to --
9 some of them attend the meetings, and I would
10 say -- for example, we would -- you know, in the
11 context of FDA, we would invite like both Lisa and
12 Josh to attend these meetings. Lisa never
13 attended because, as I said, she refused to do any
14 business development activities, but Josh would
15 attend on occasion, maybe even half the time or
16 more. And when he wouldn't show up to these, you
17 know, he basically would say he had various client
18 assignments to do.

19 So that was our pipeline meetings.

20 Q Okay. I'm going to show you some
21 documents. She's going to put a little label on
22 it and give it to you, and then I'll ask you some

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

70

1 questions about it.

2 MR. COHEN: And from here forward we'll
3 designate the deposition to be confidential.

4 (The following portion from 70:9 to
5 242:3 was designated confidential.)

6 (Liang Deposition Exhibit No. 1 was
7 marked for identification and was attached to the
8 deposition transcript.)

9 <-- CONFIDENTIAL
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

71

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

72

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

73

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

74

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

75

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

76

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

77

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

78

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

79

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

80

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

81

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

82

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

83

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

84

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

85

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

86

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

87

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

88

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

89

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

90

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

91

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

92

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

93

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

94

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

95

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

96

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

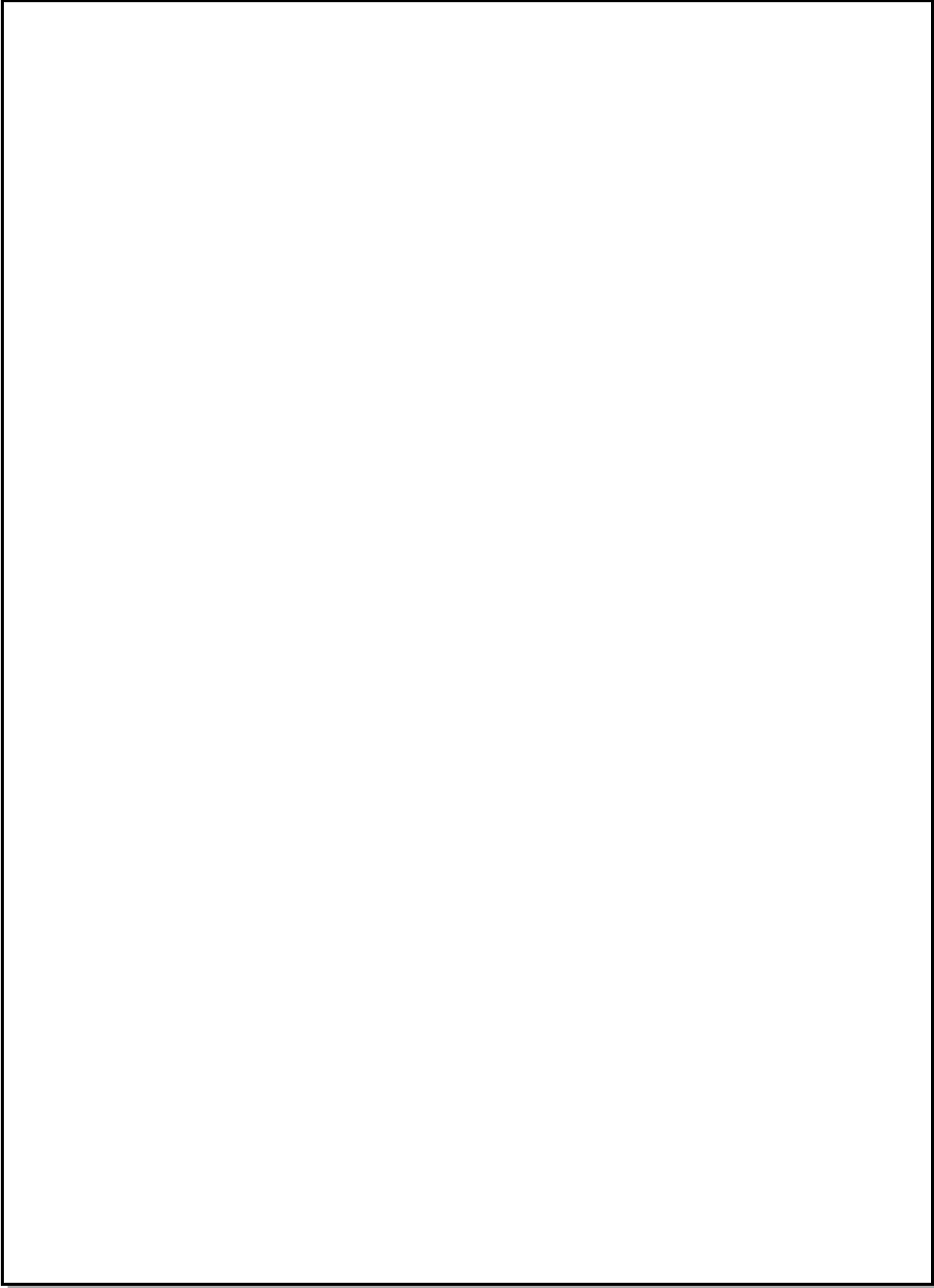
97

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

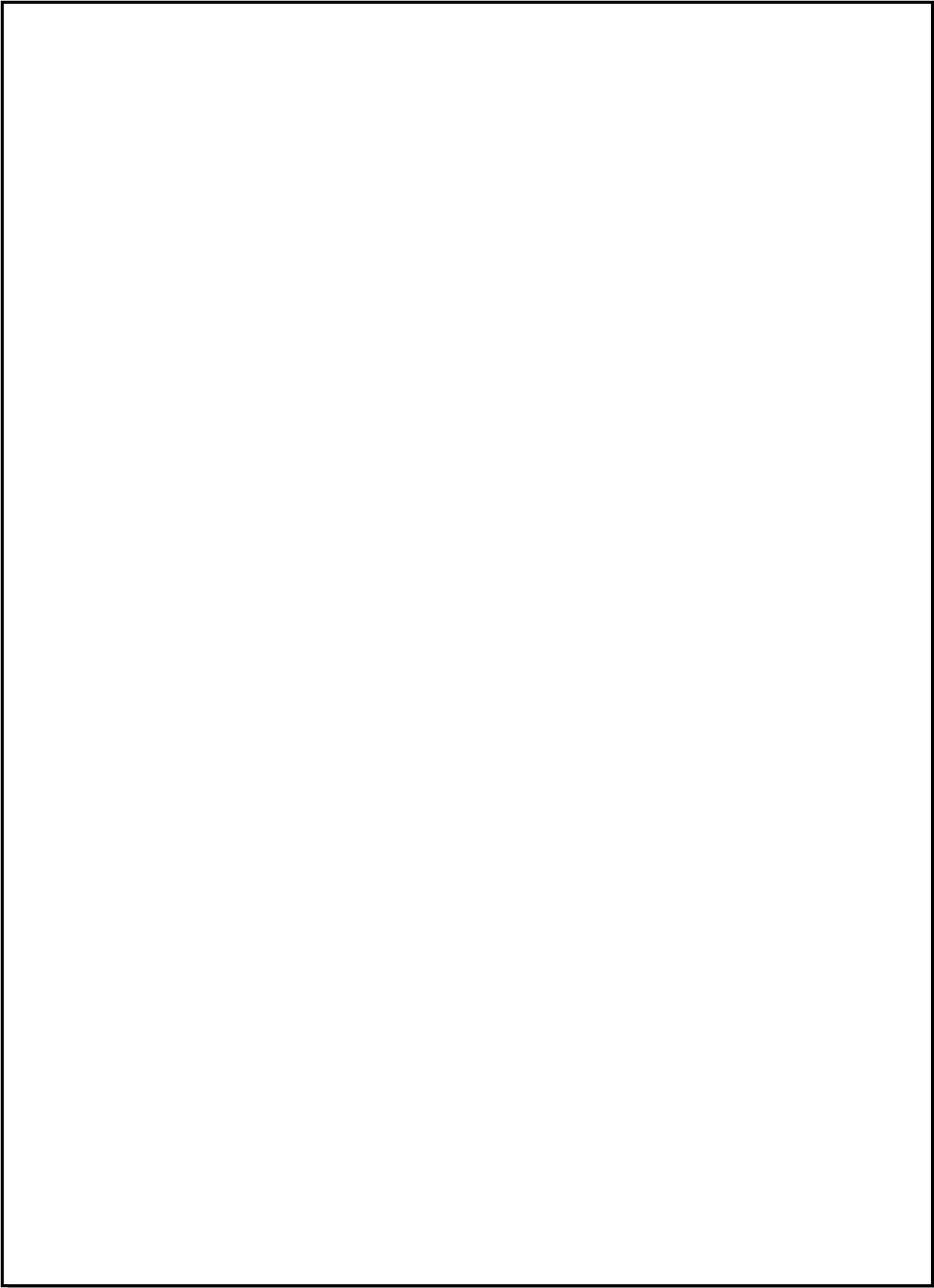
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

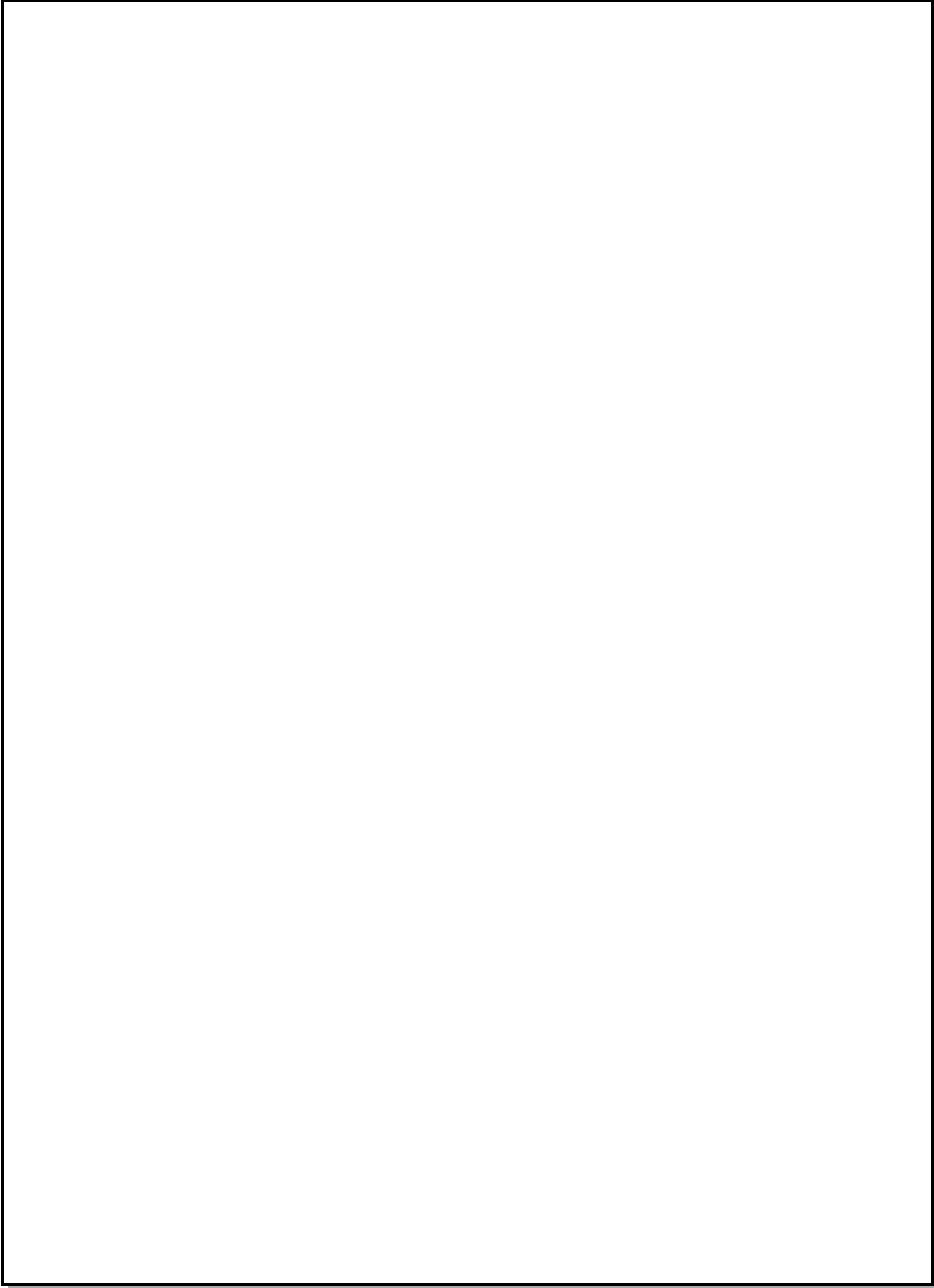
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

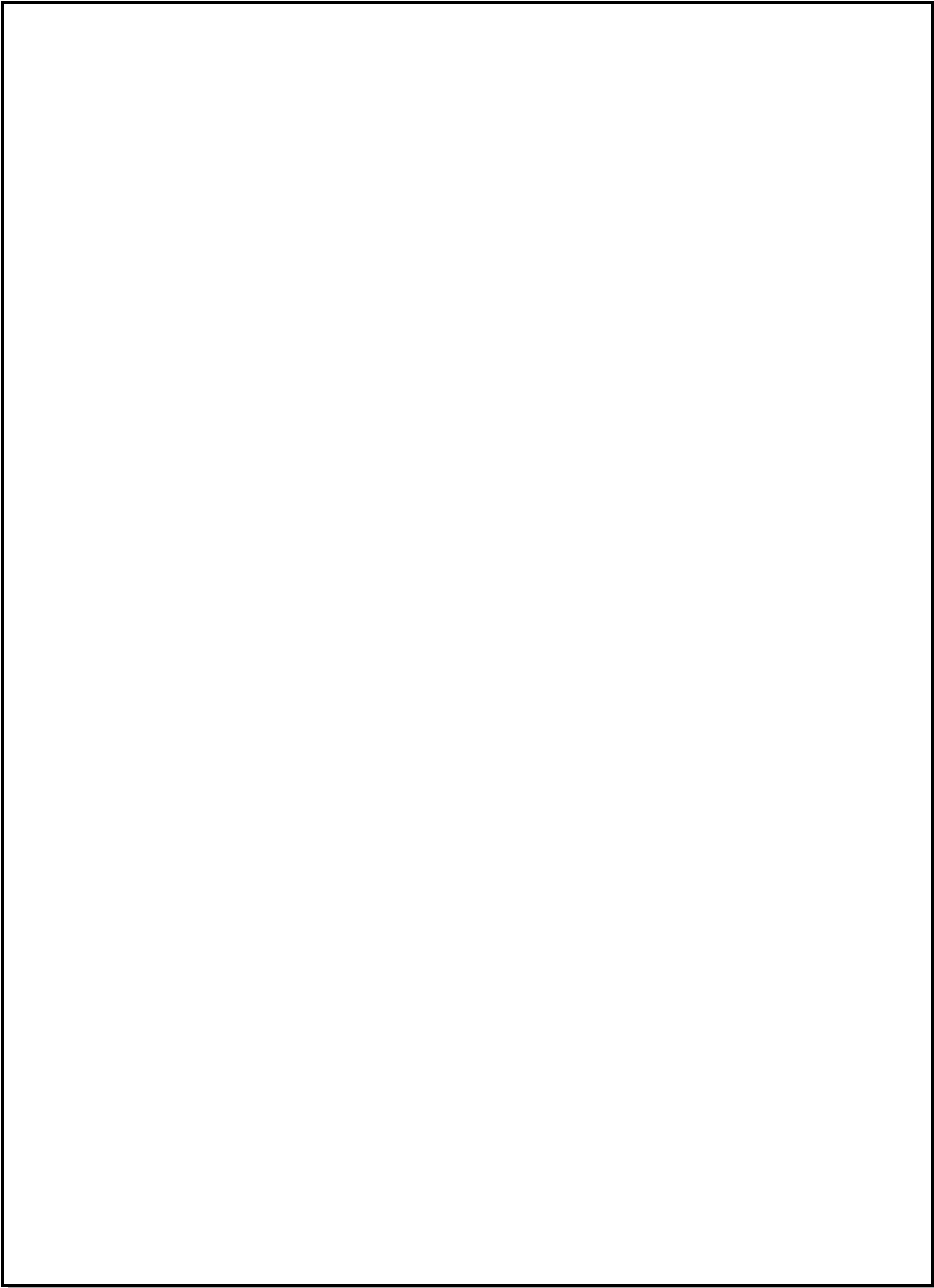
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

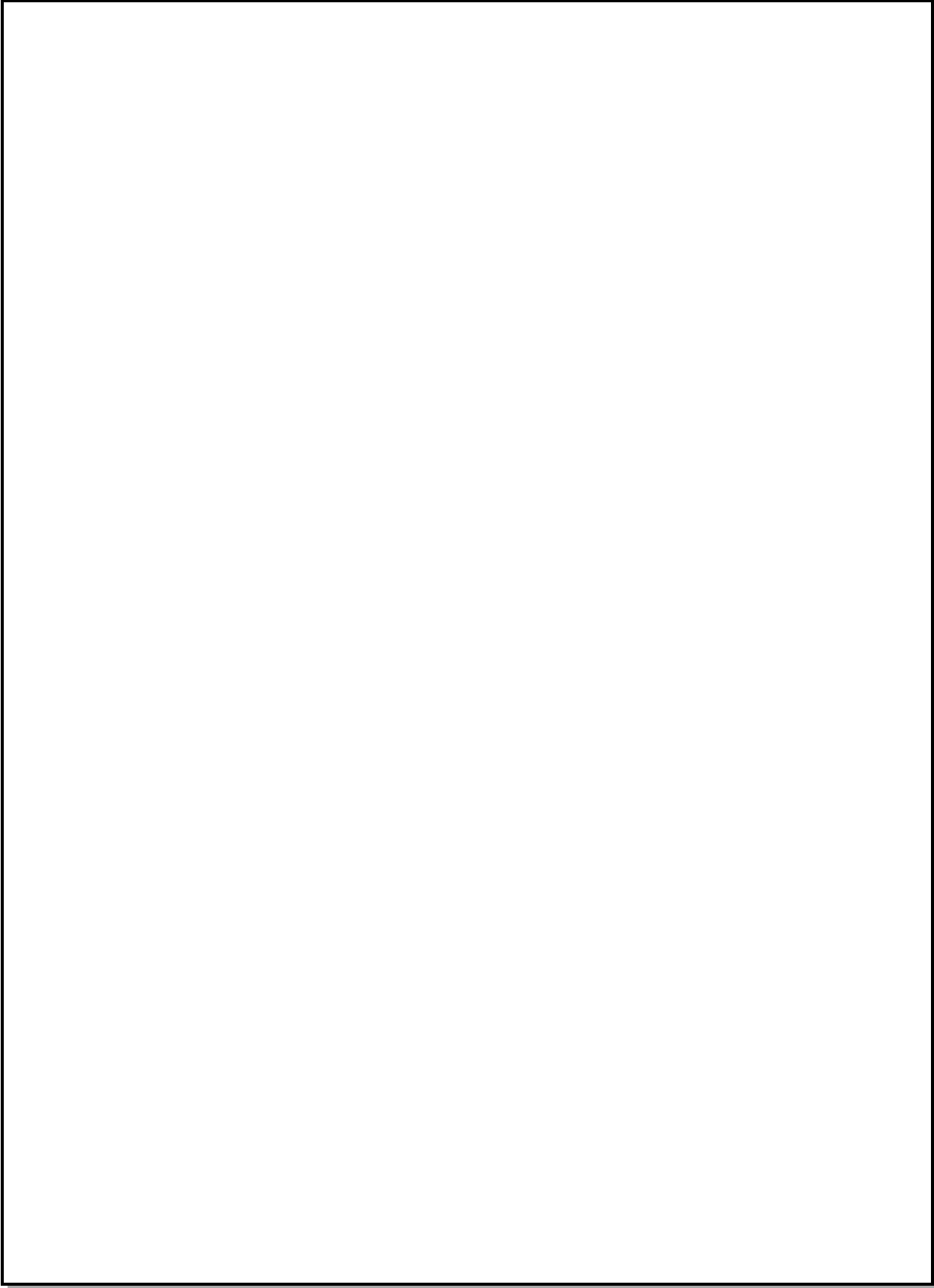
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

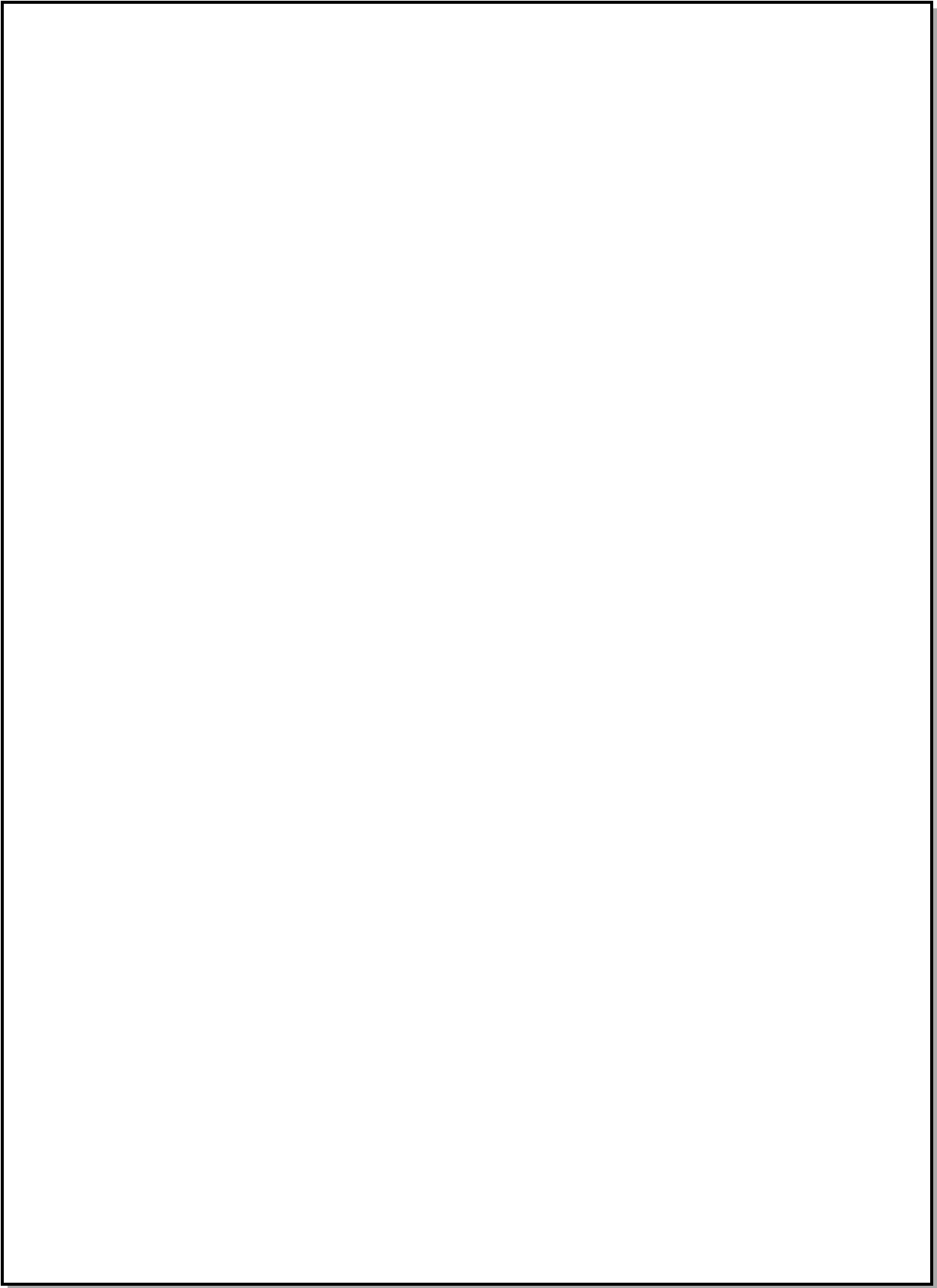
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

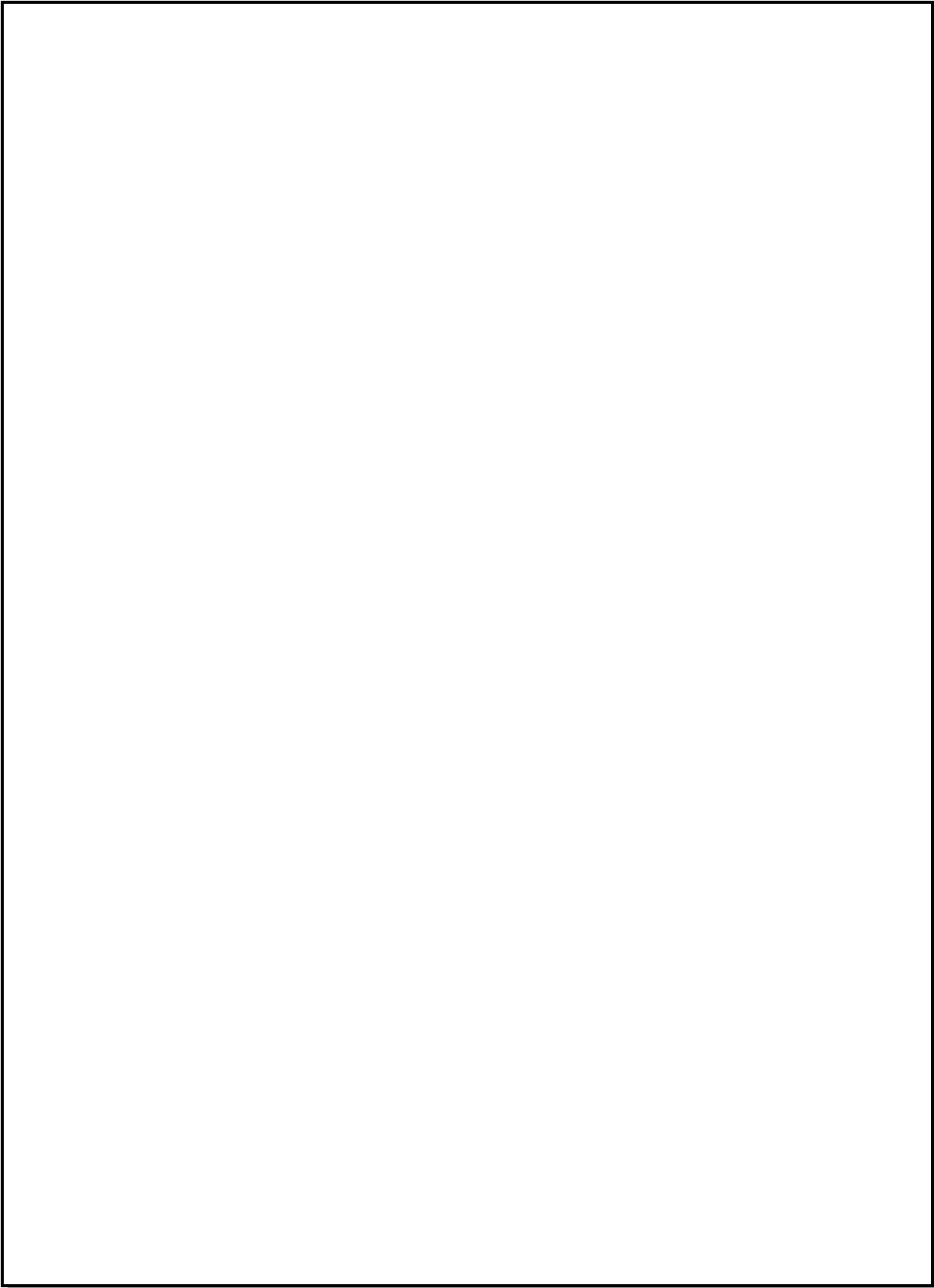
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

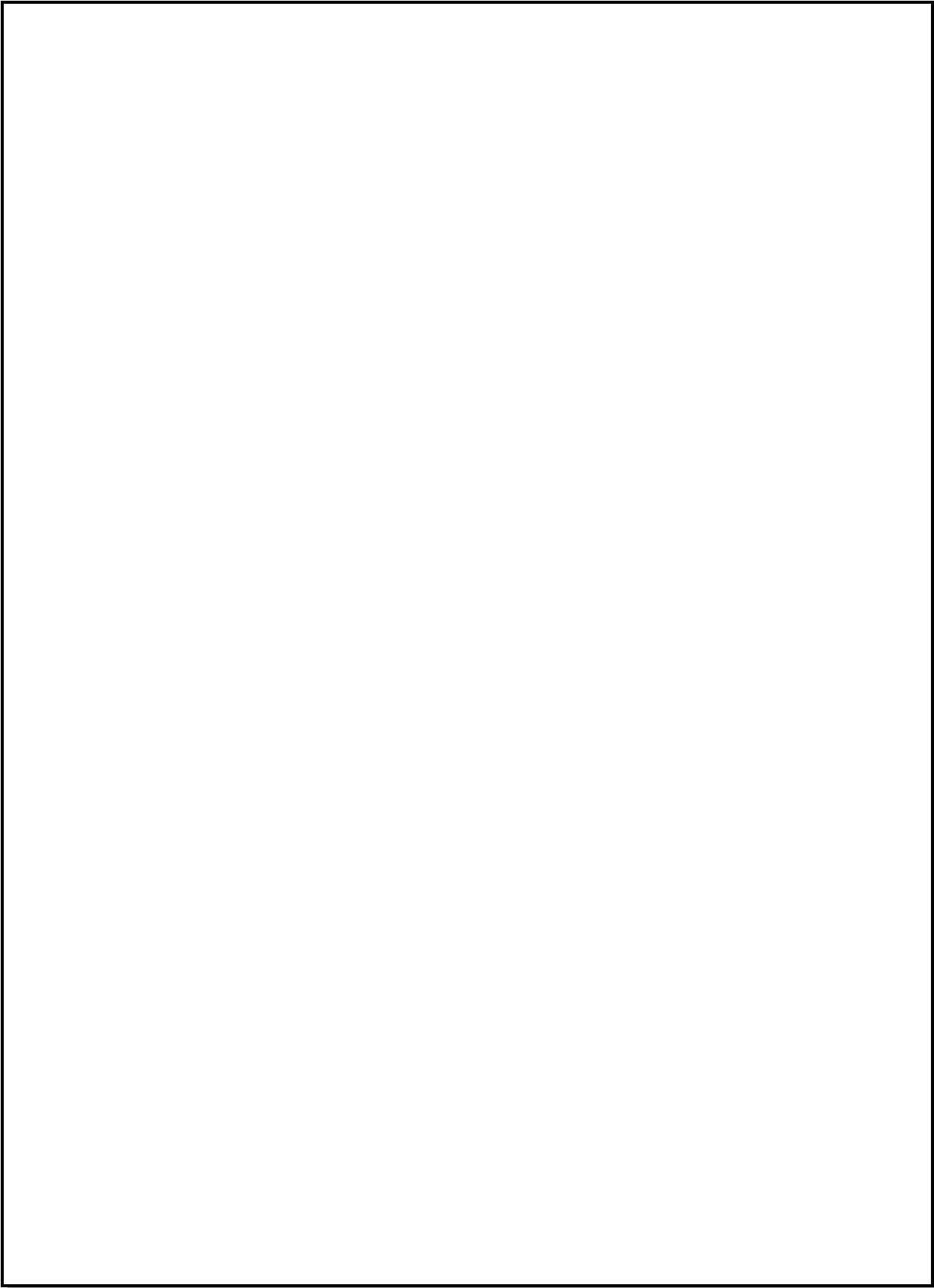
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

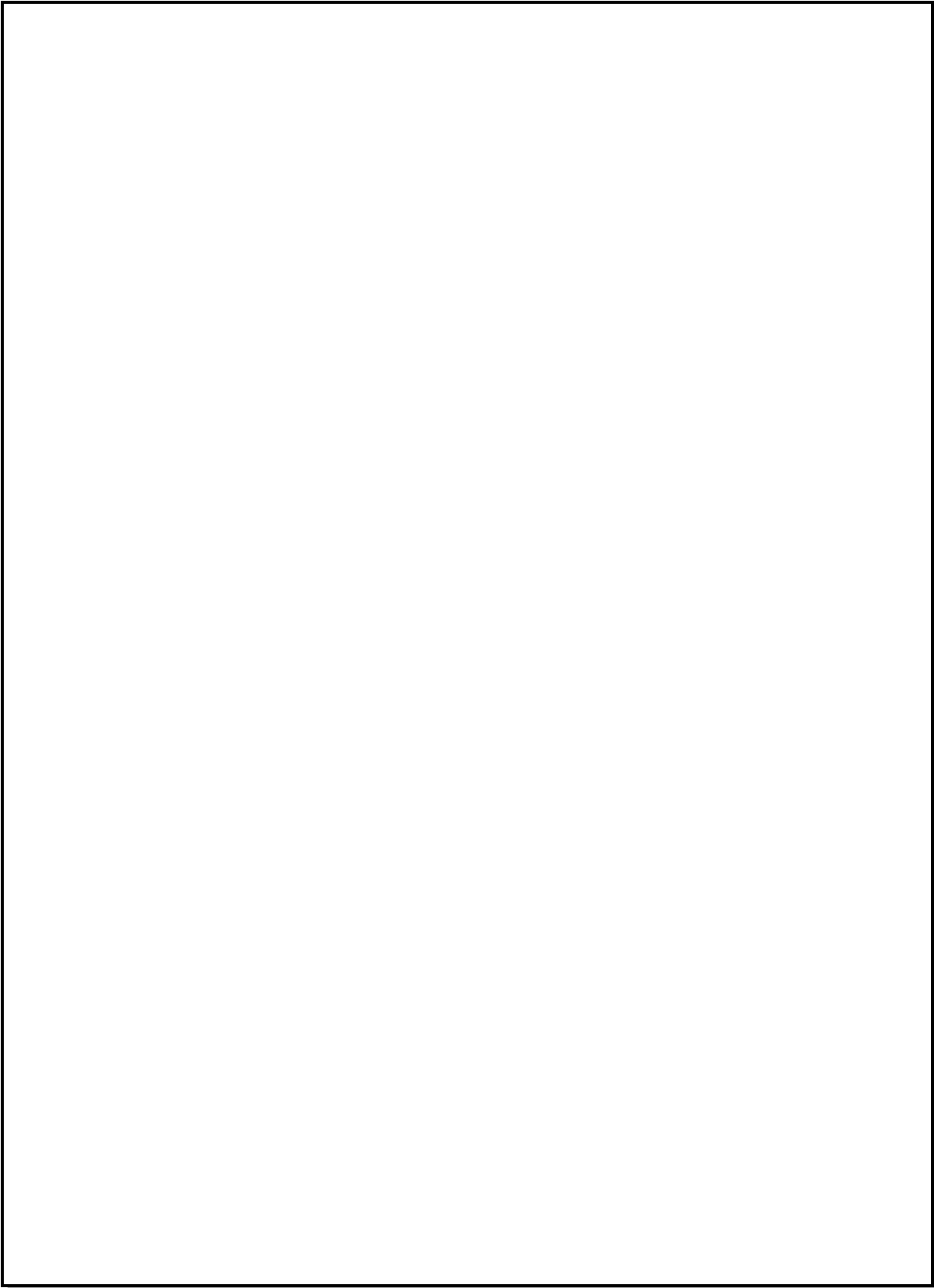
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

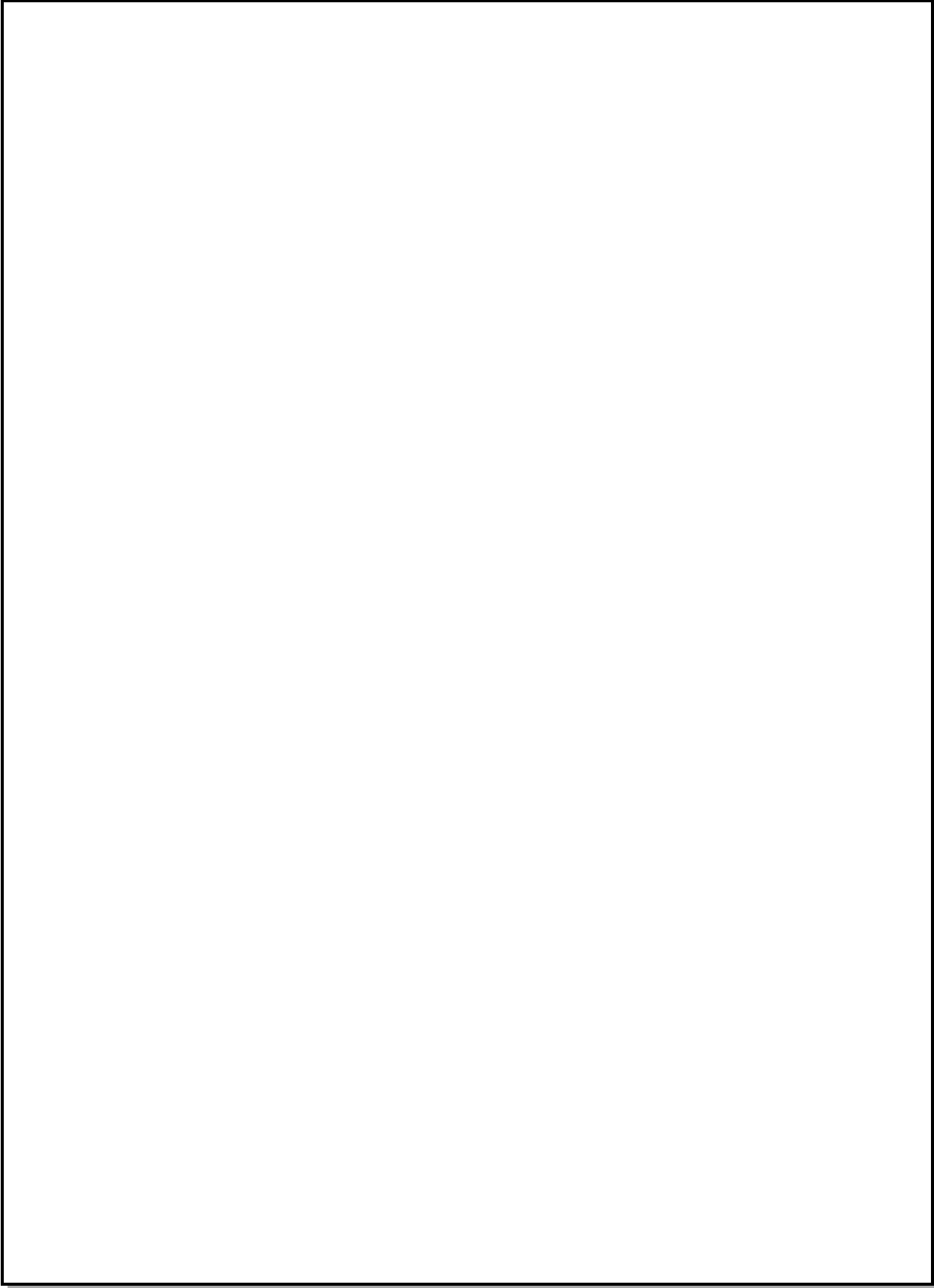
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

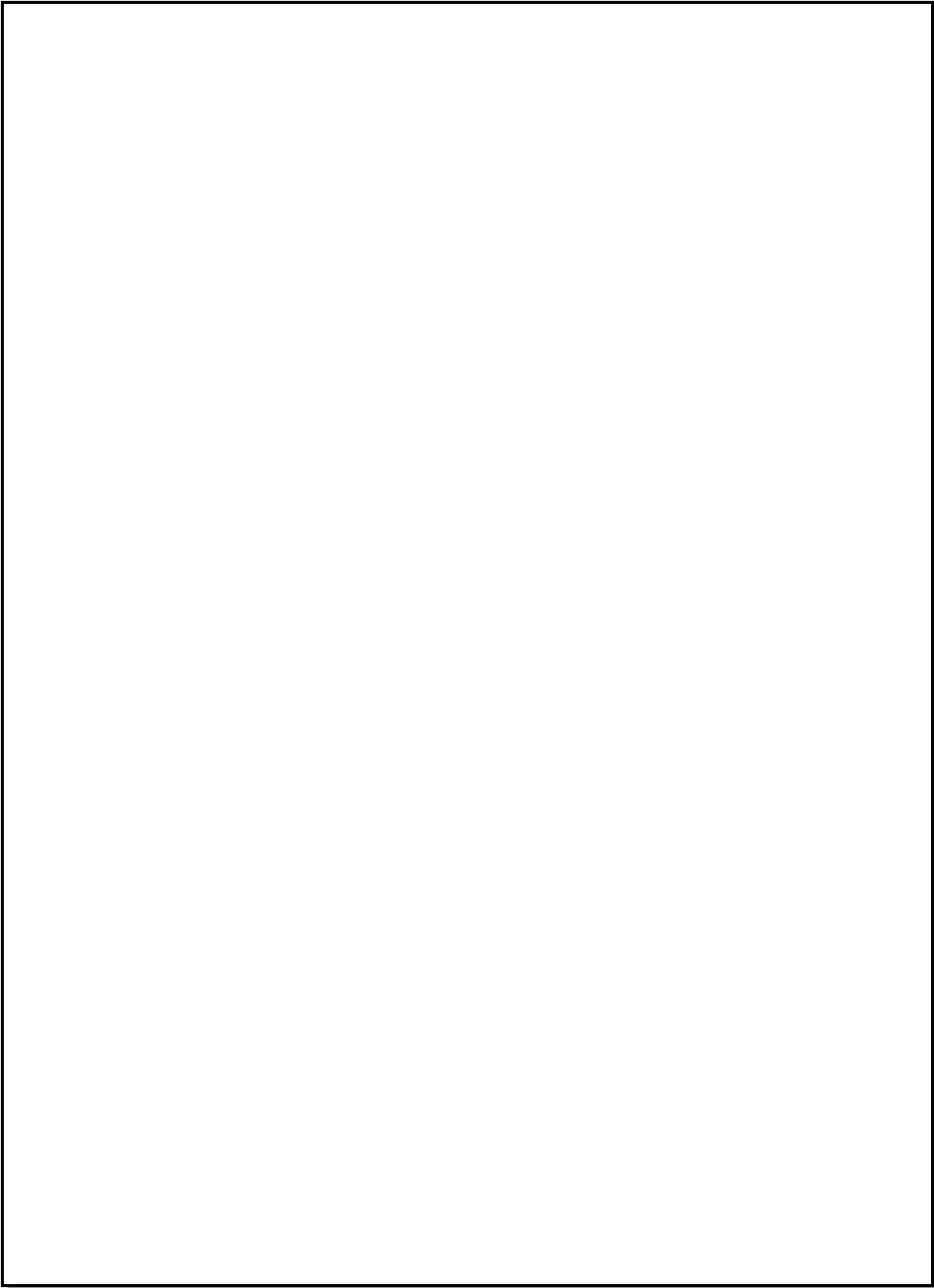
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

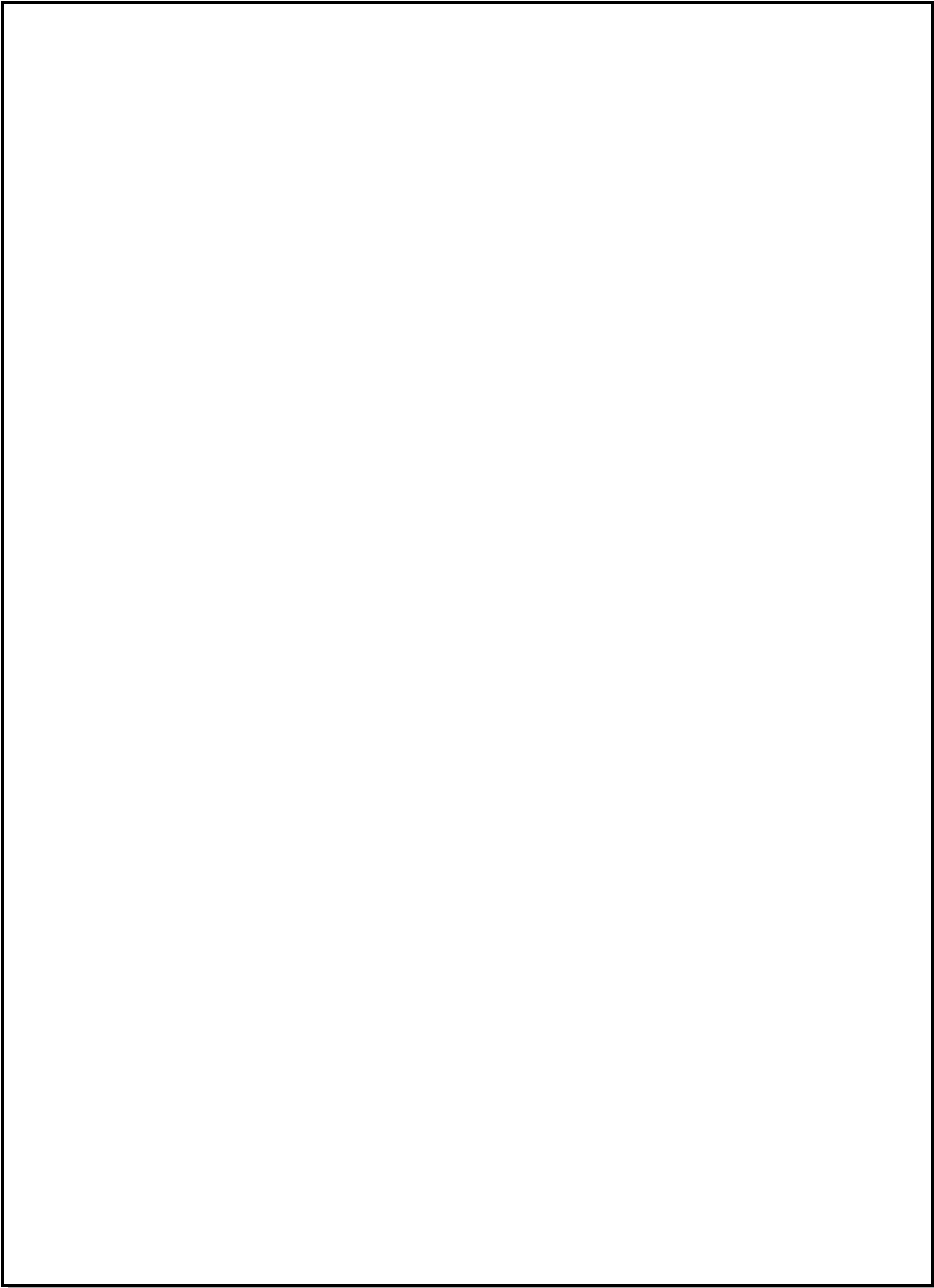
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

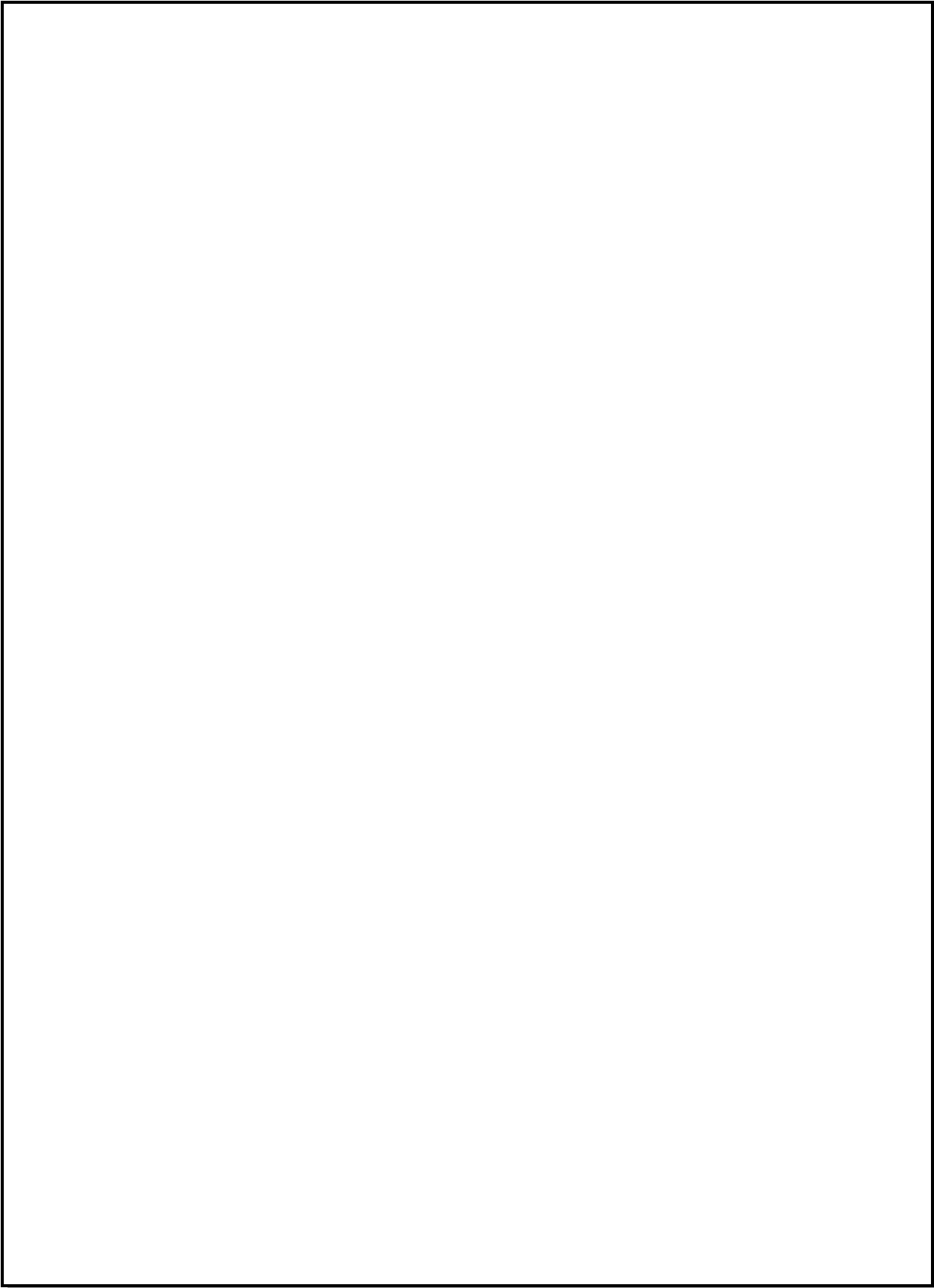
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

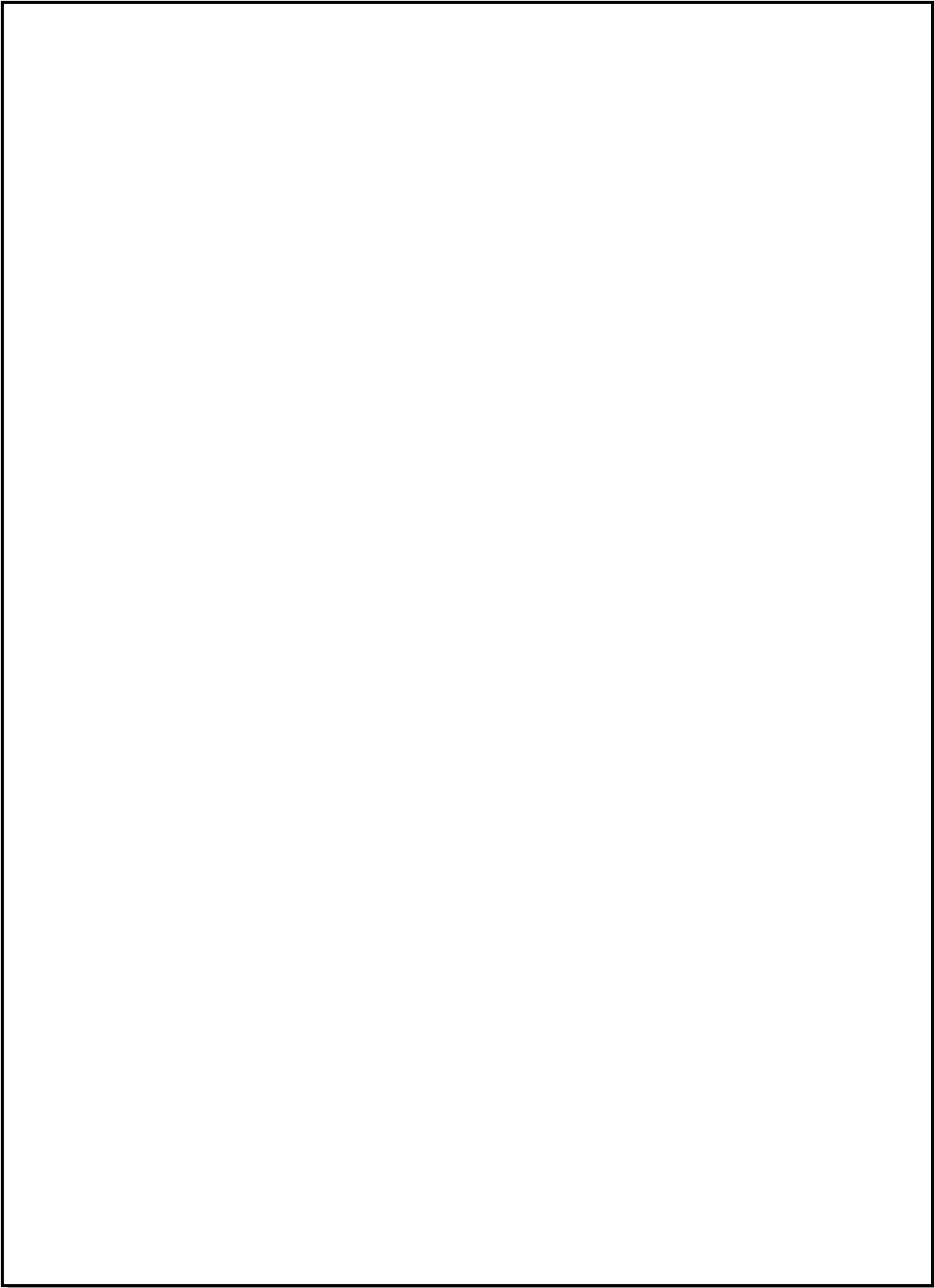
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

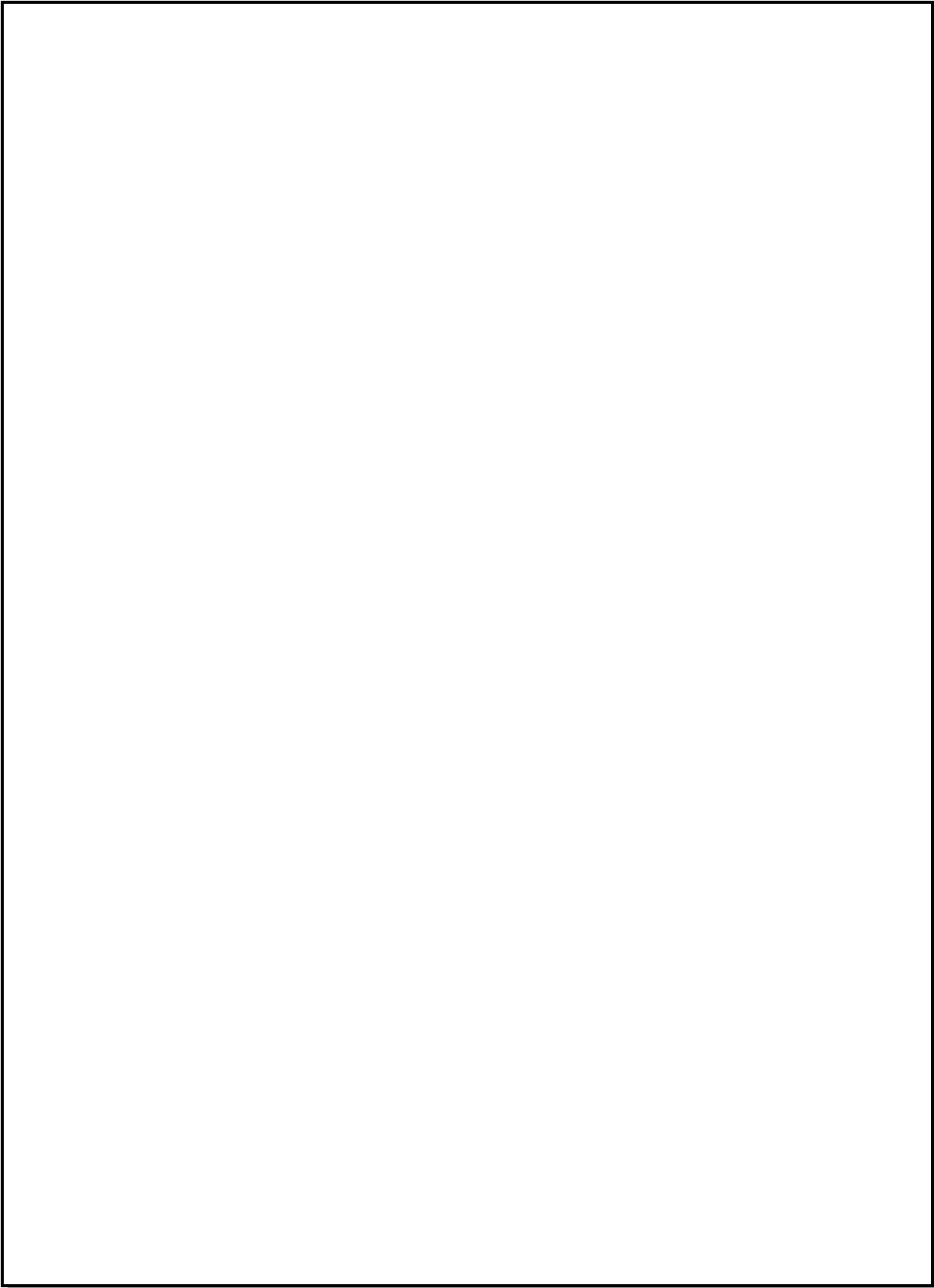
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

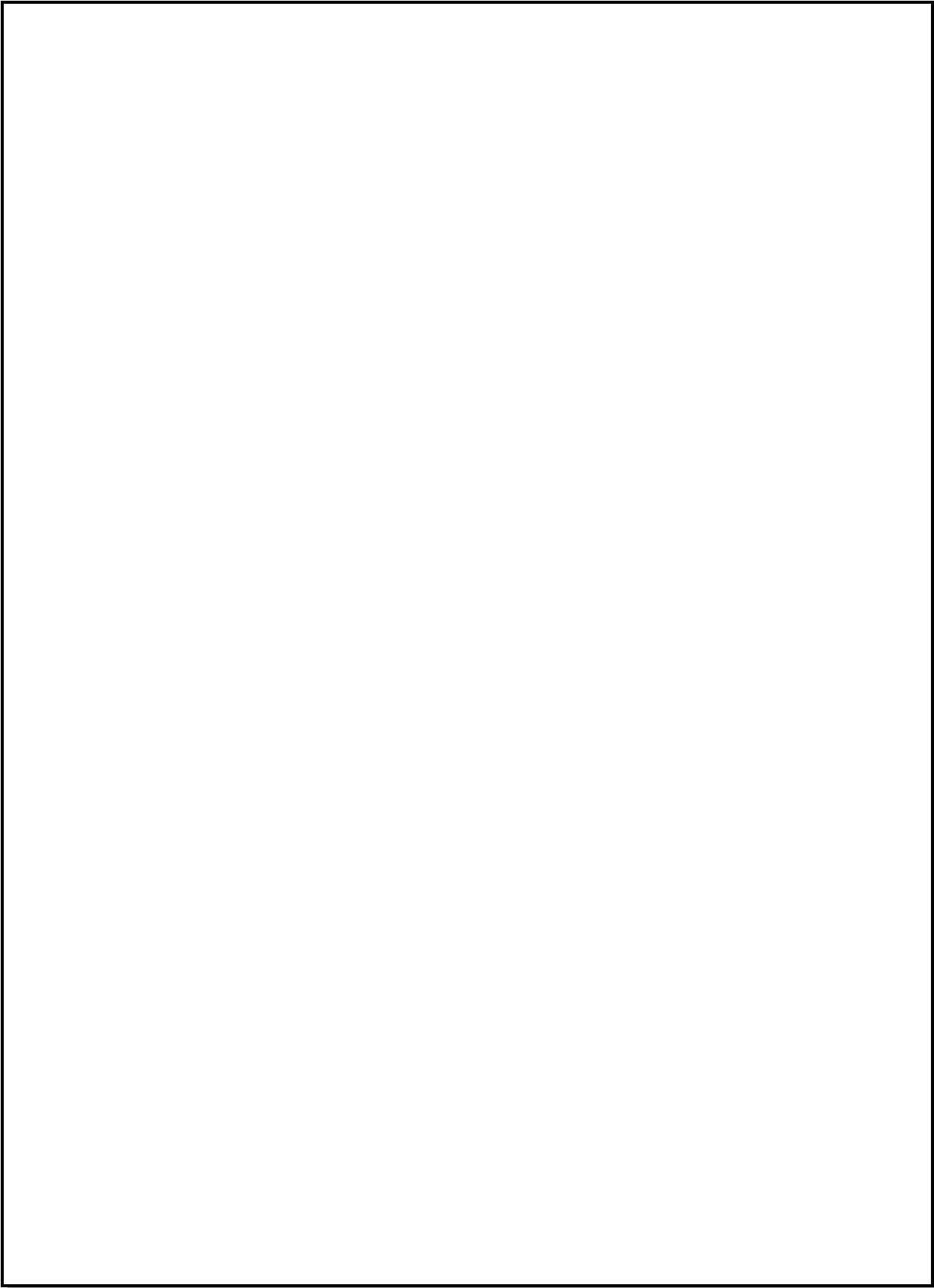
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

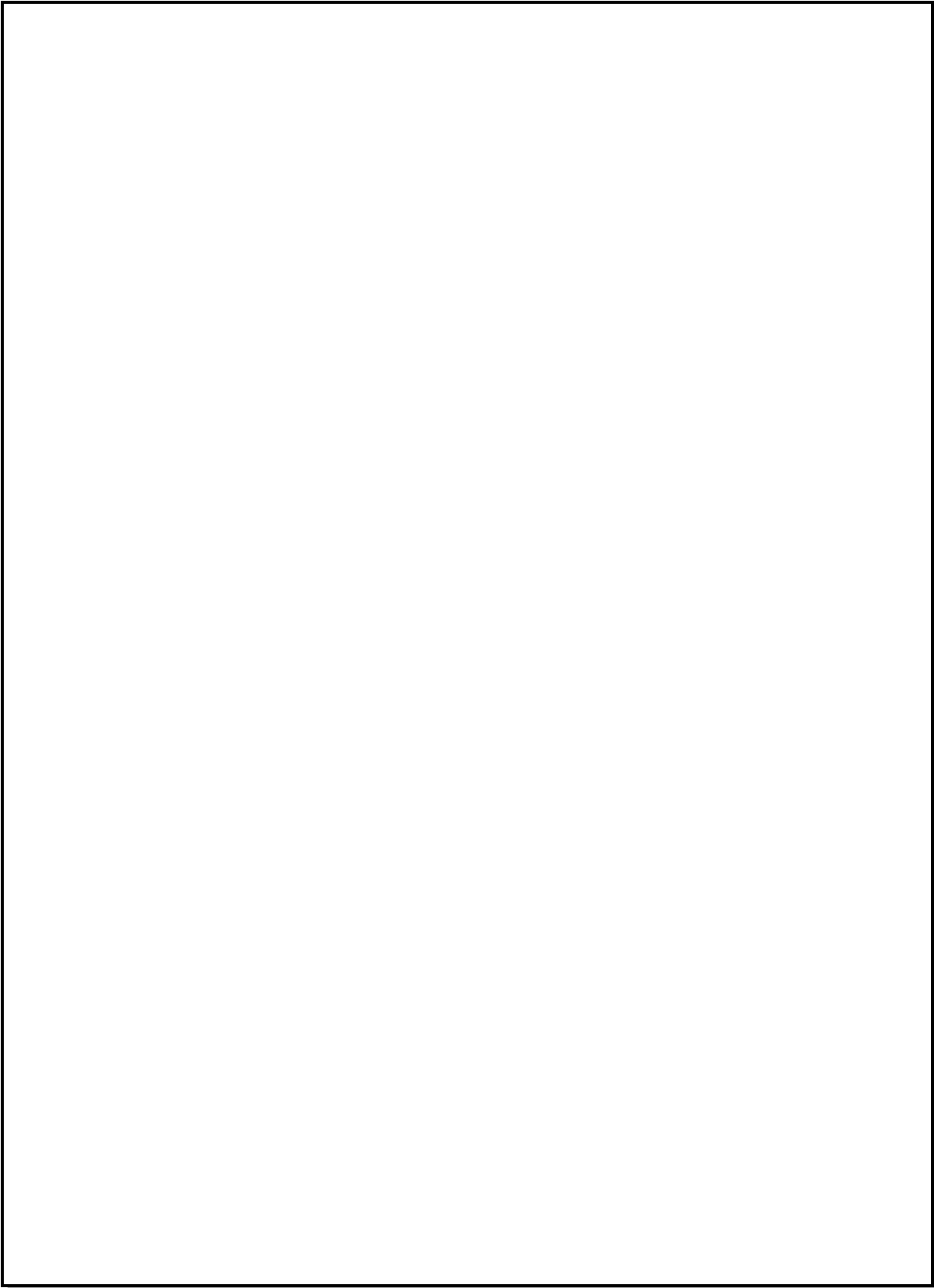
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

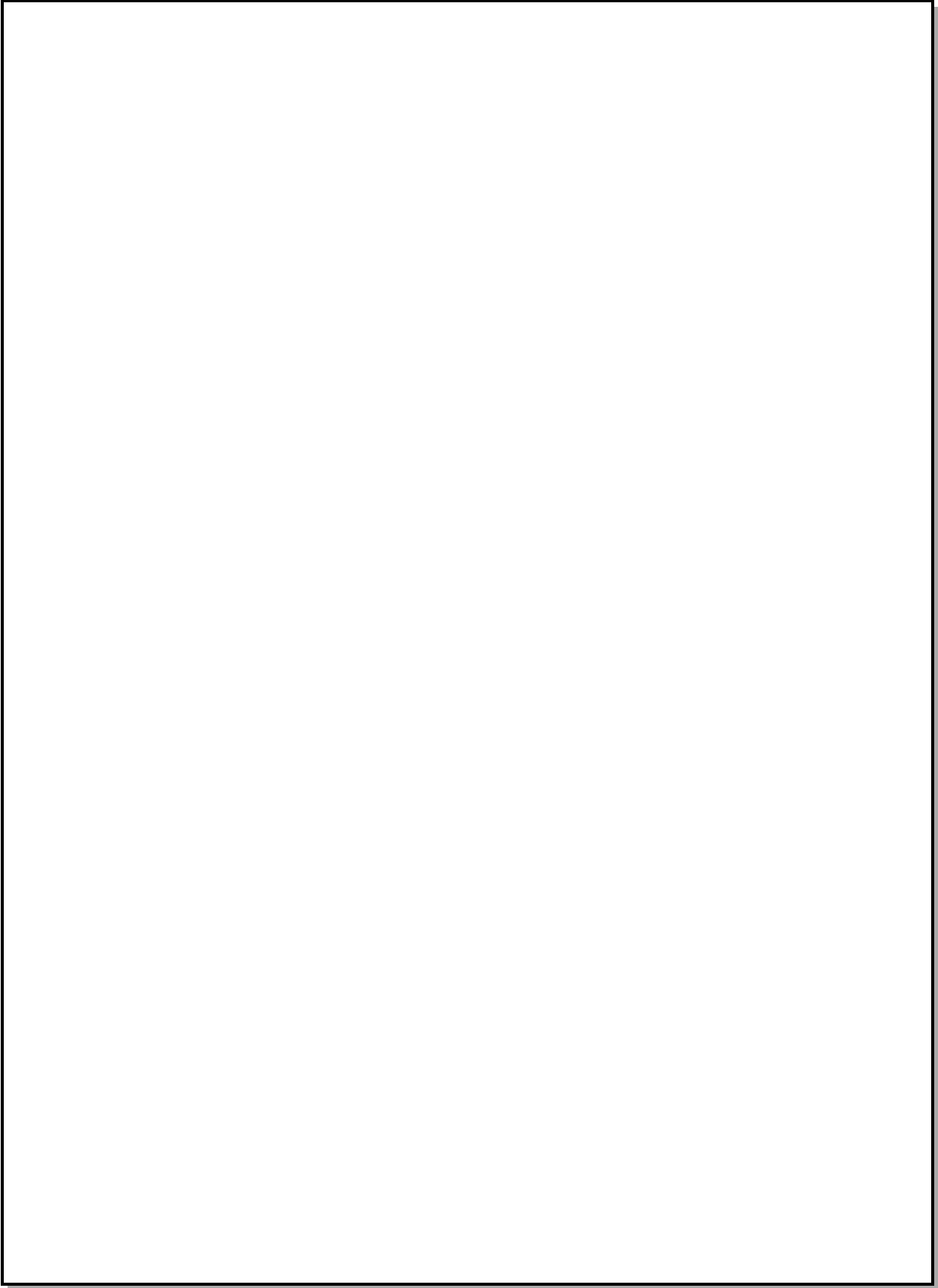
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

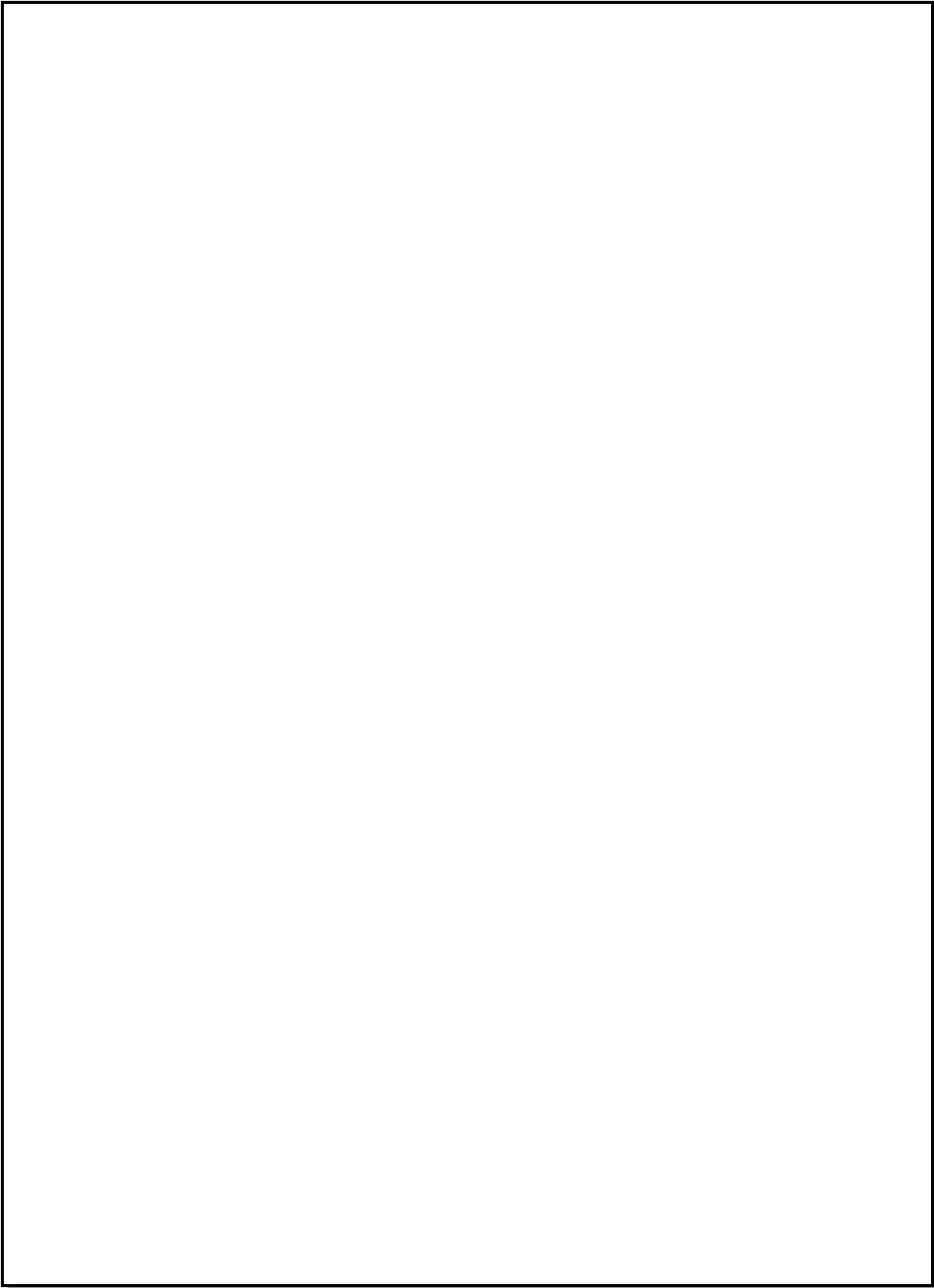
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

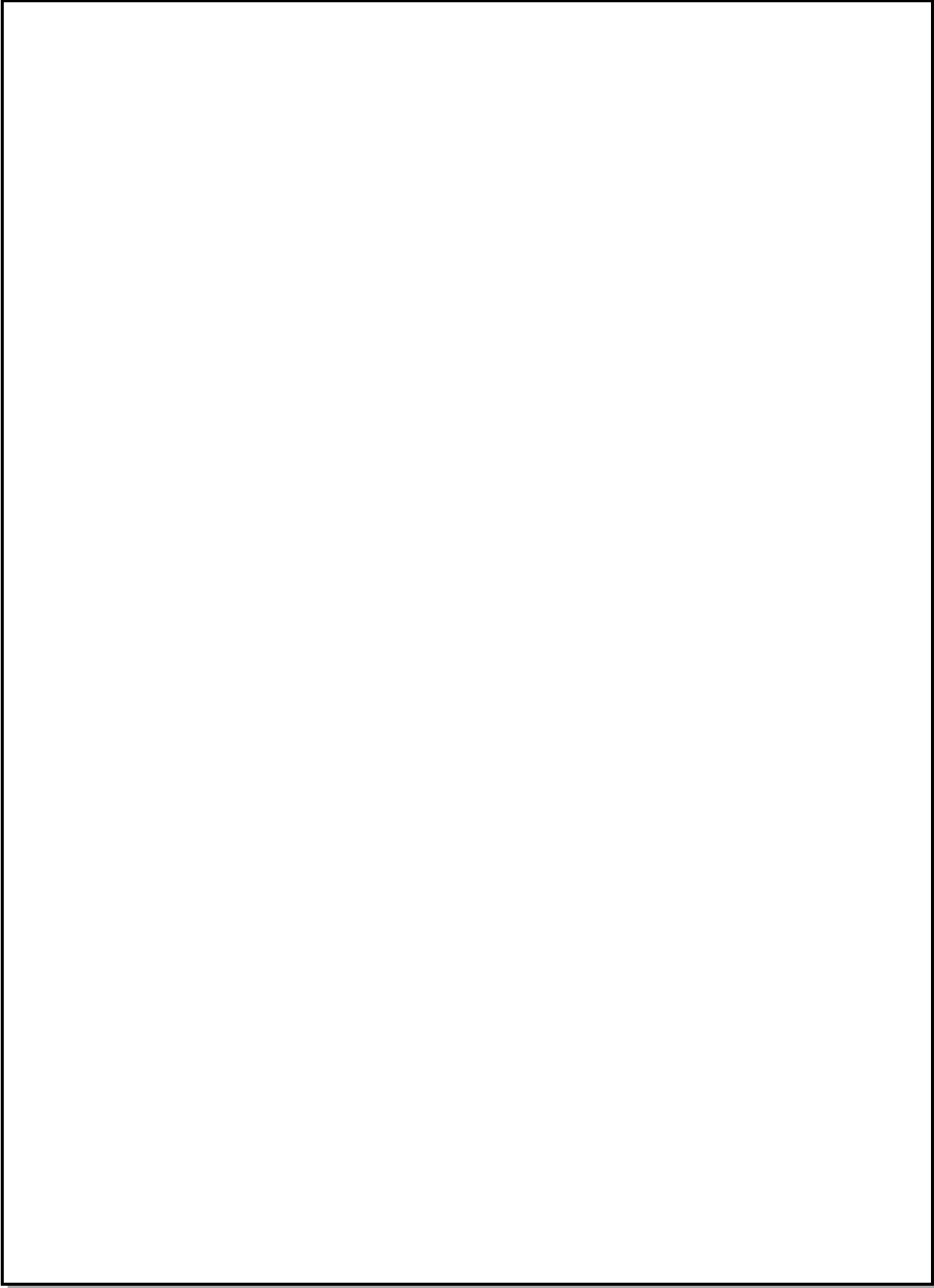
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

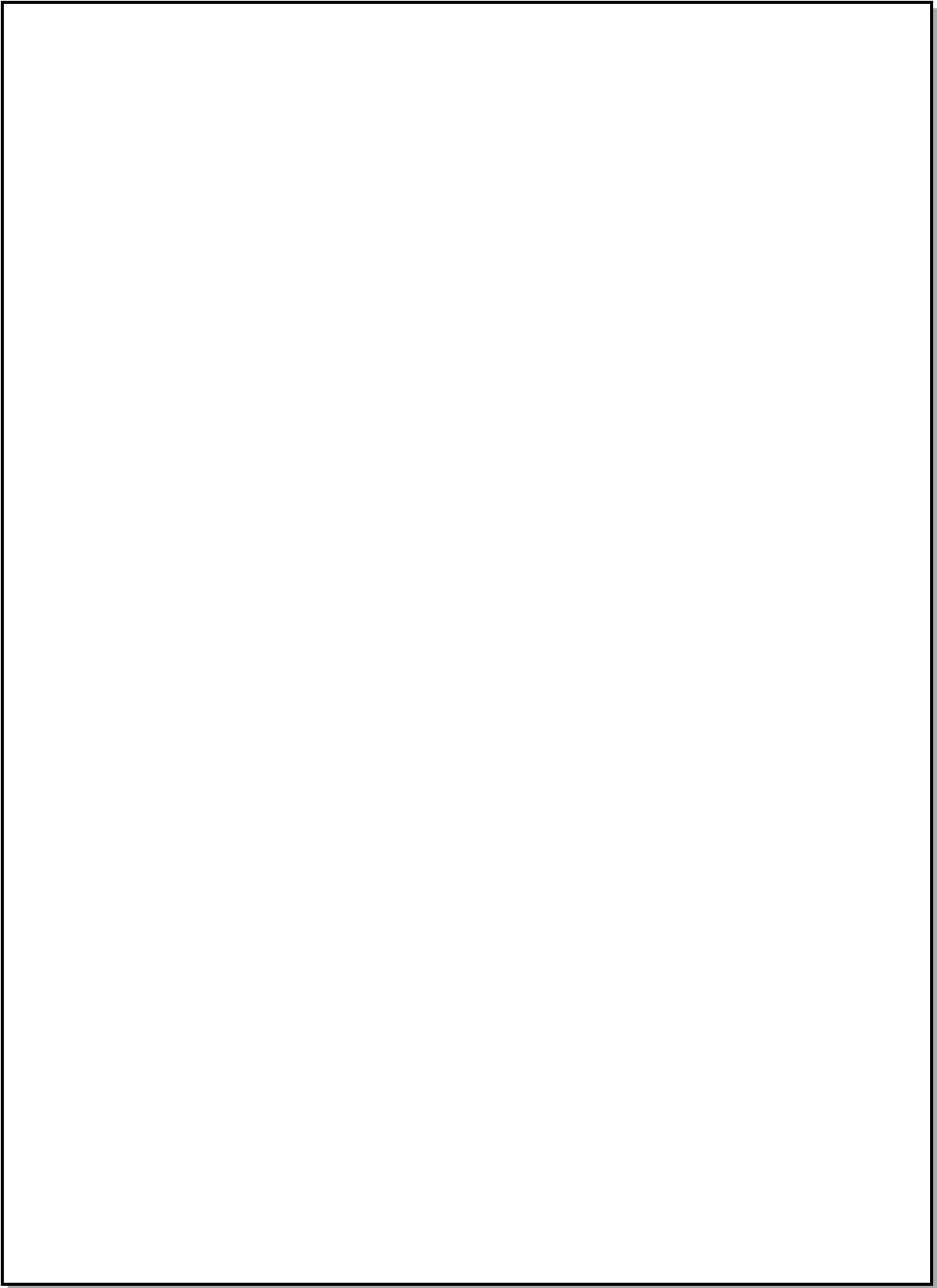
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

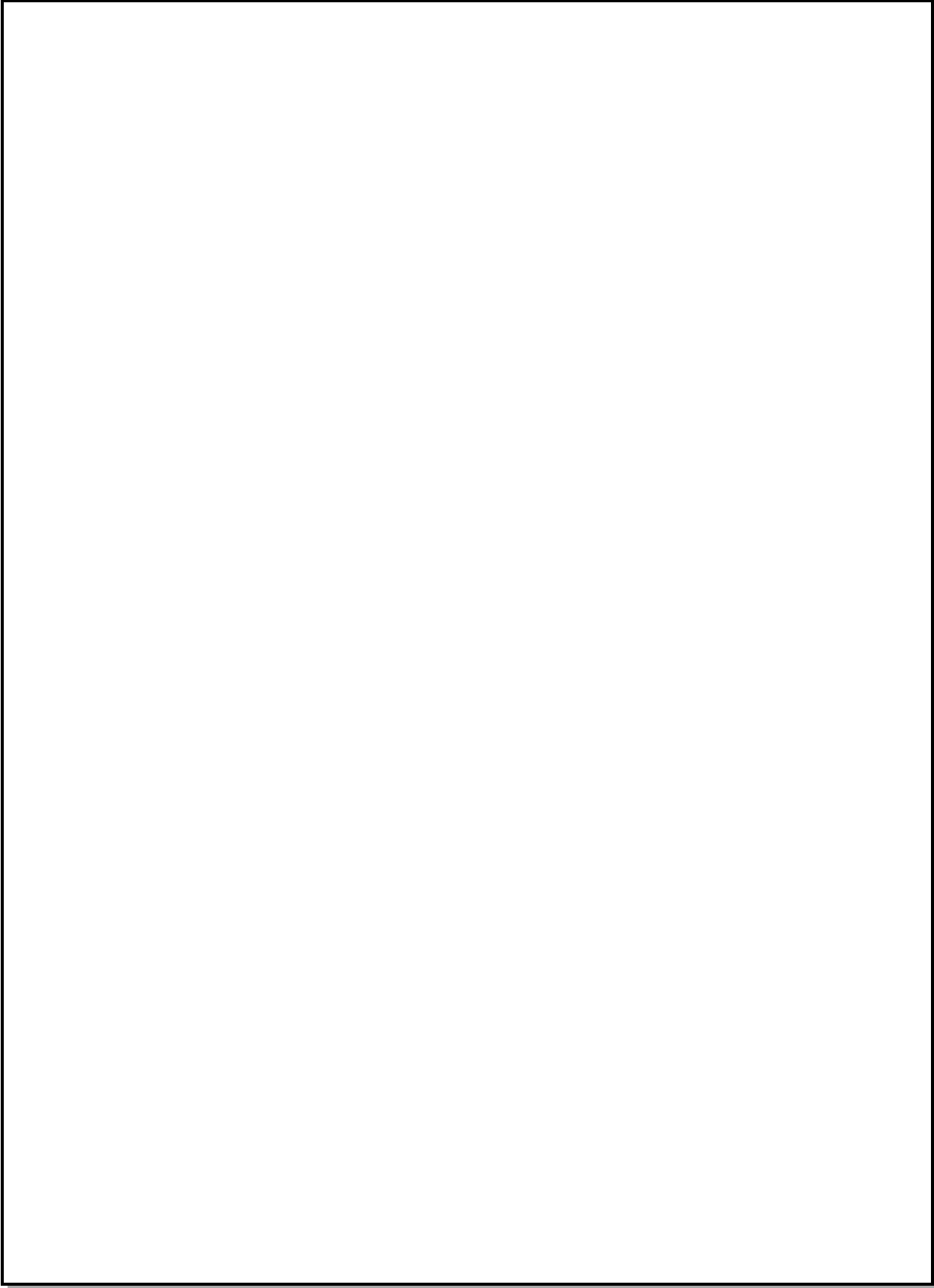
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

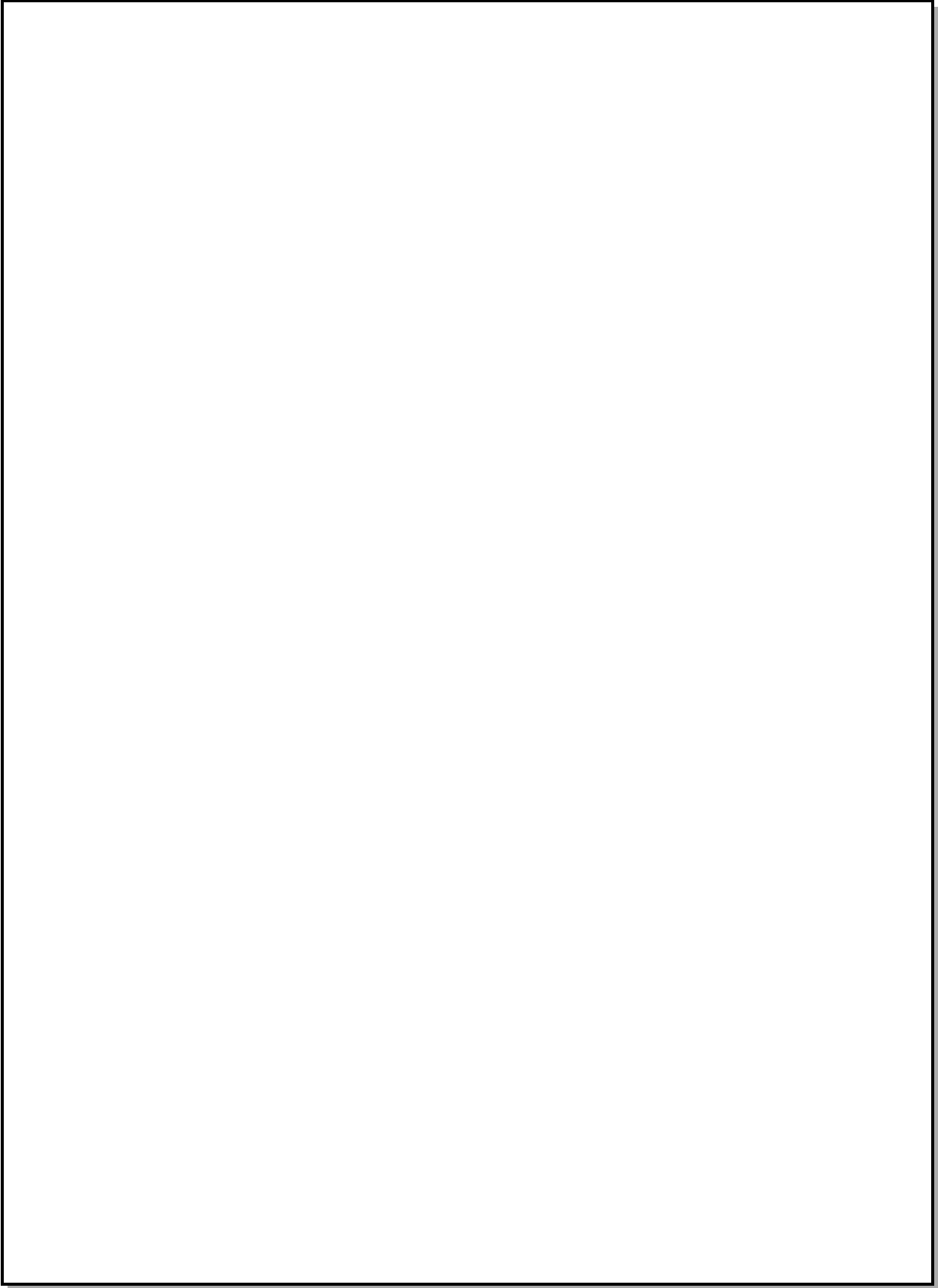
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

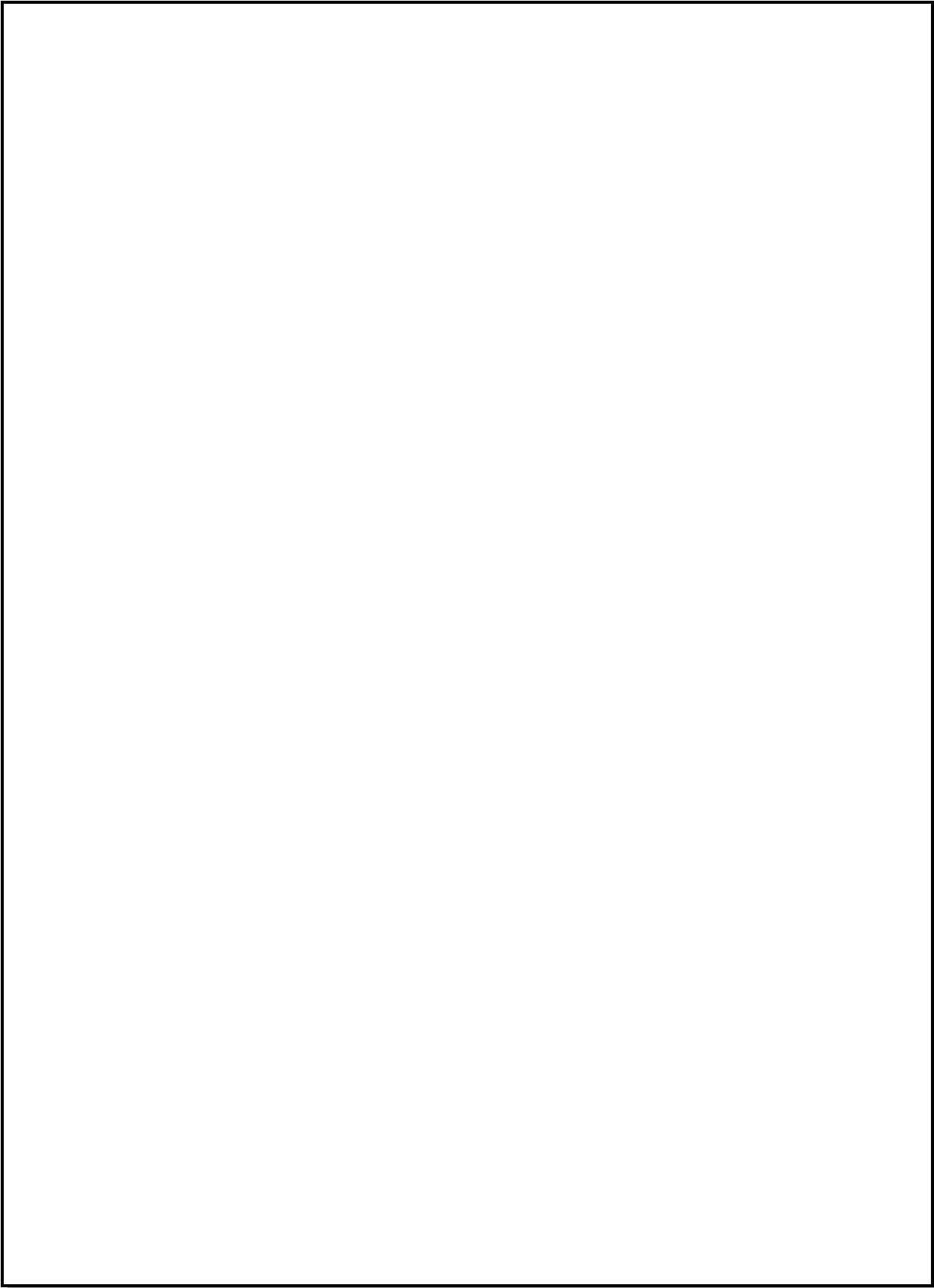
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

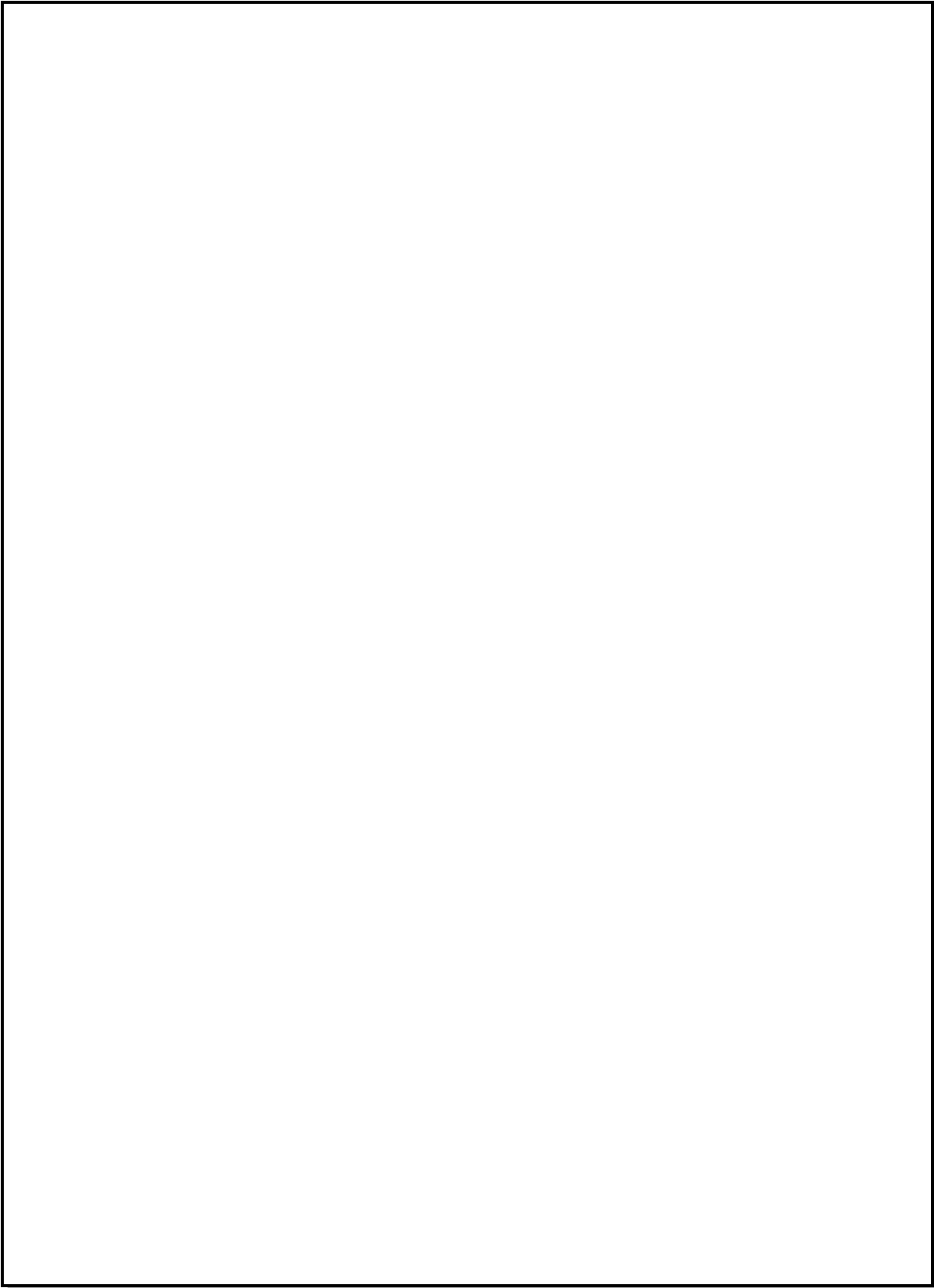
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

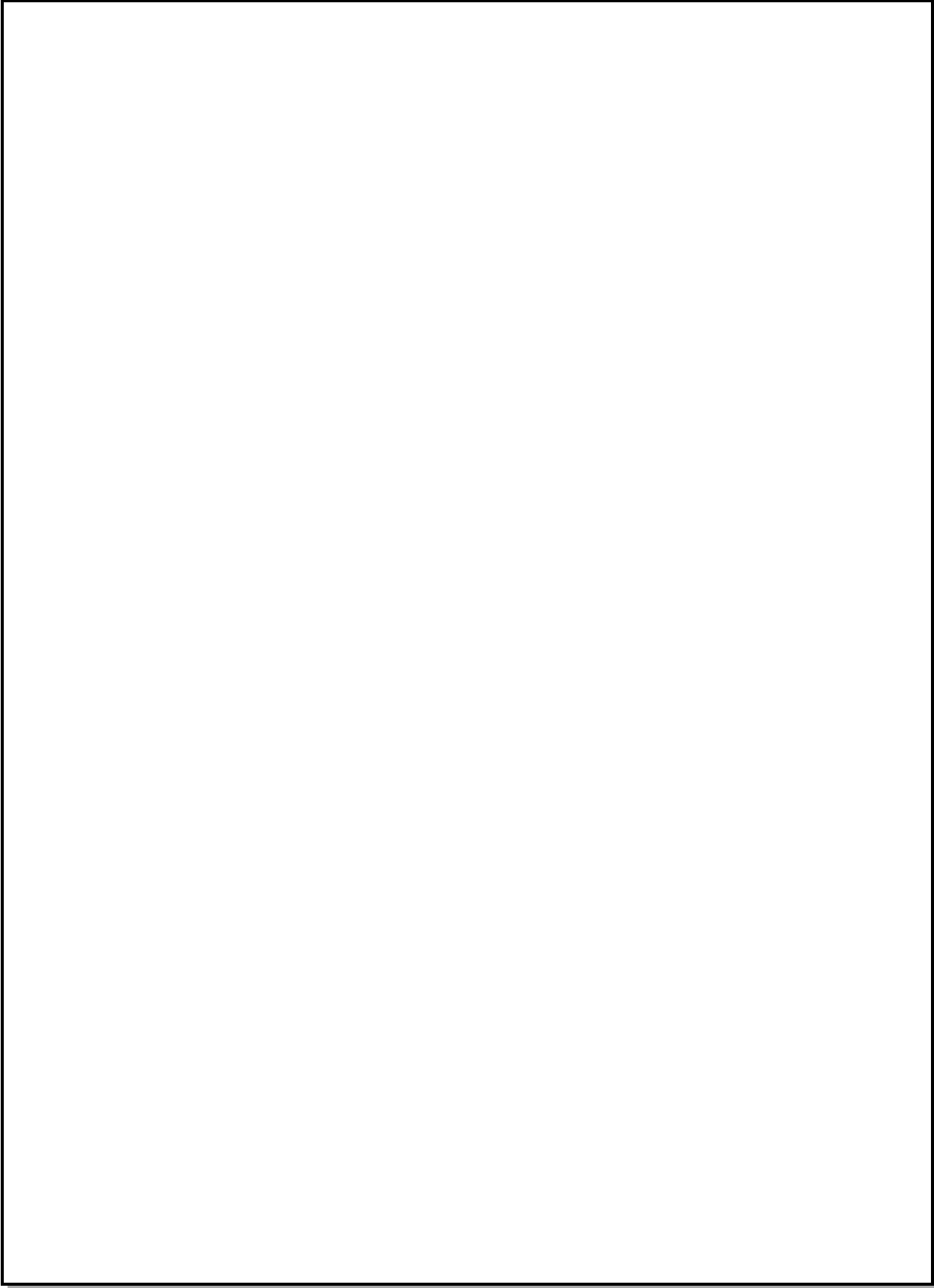
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

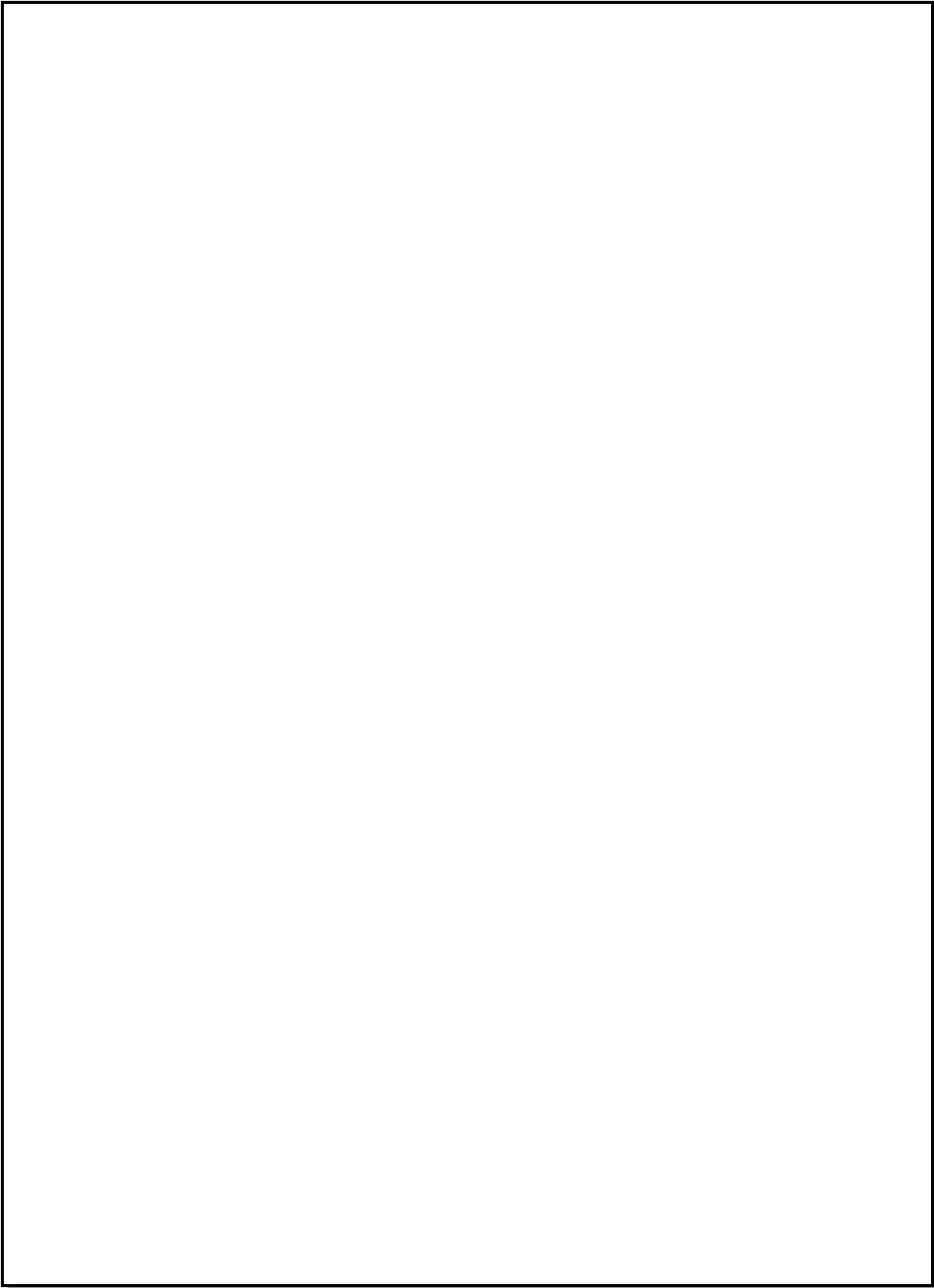
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

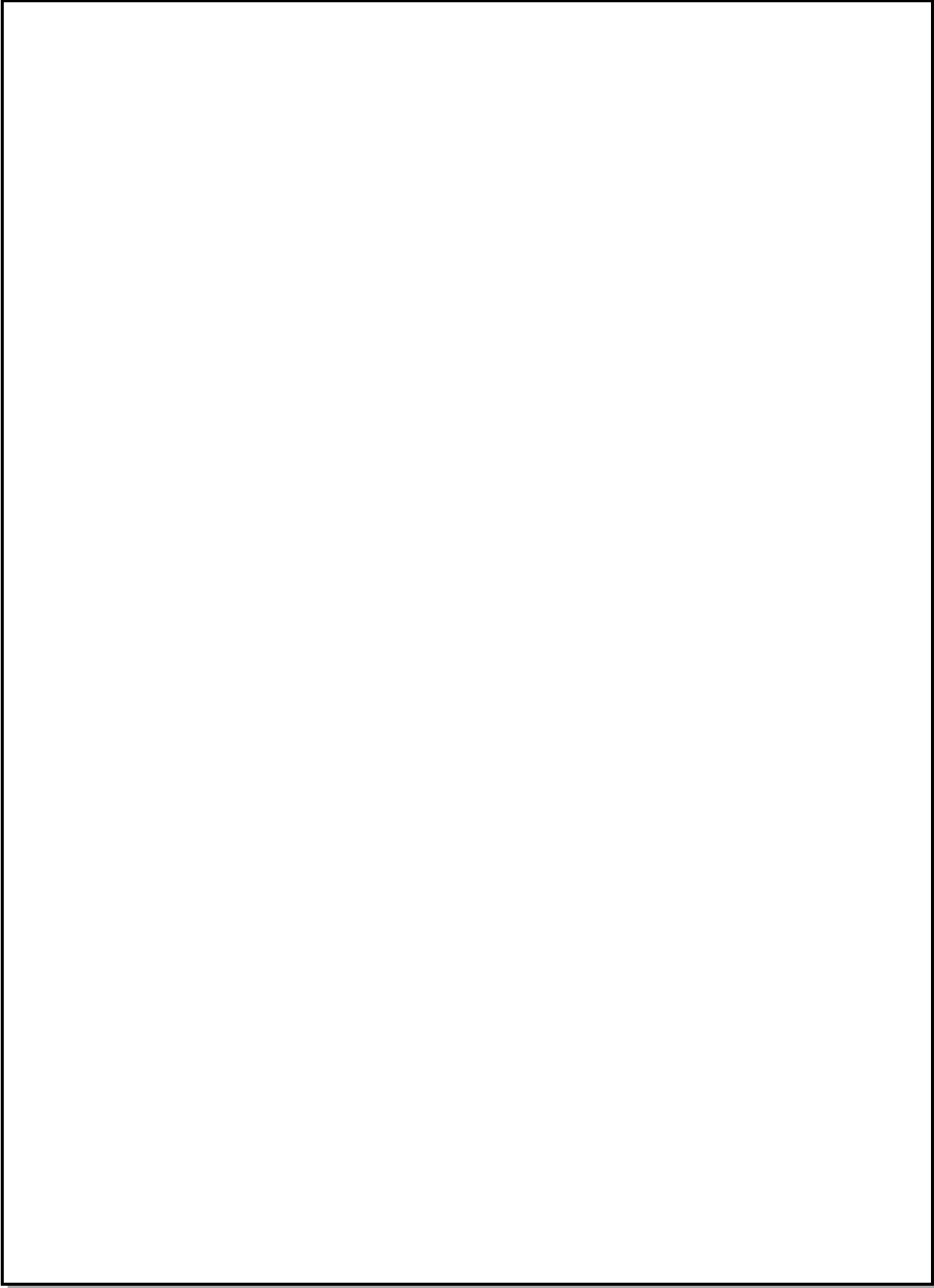
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

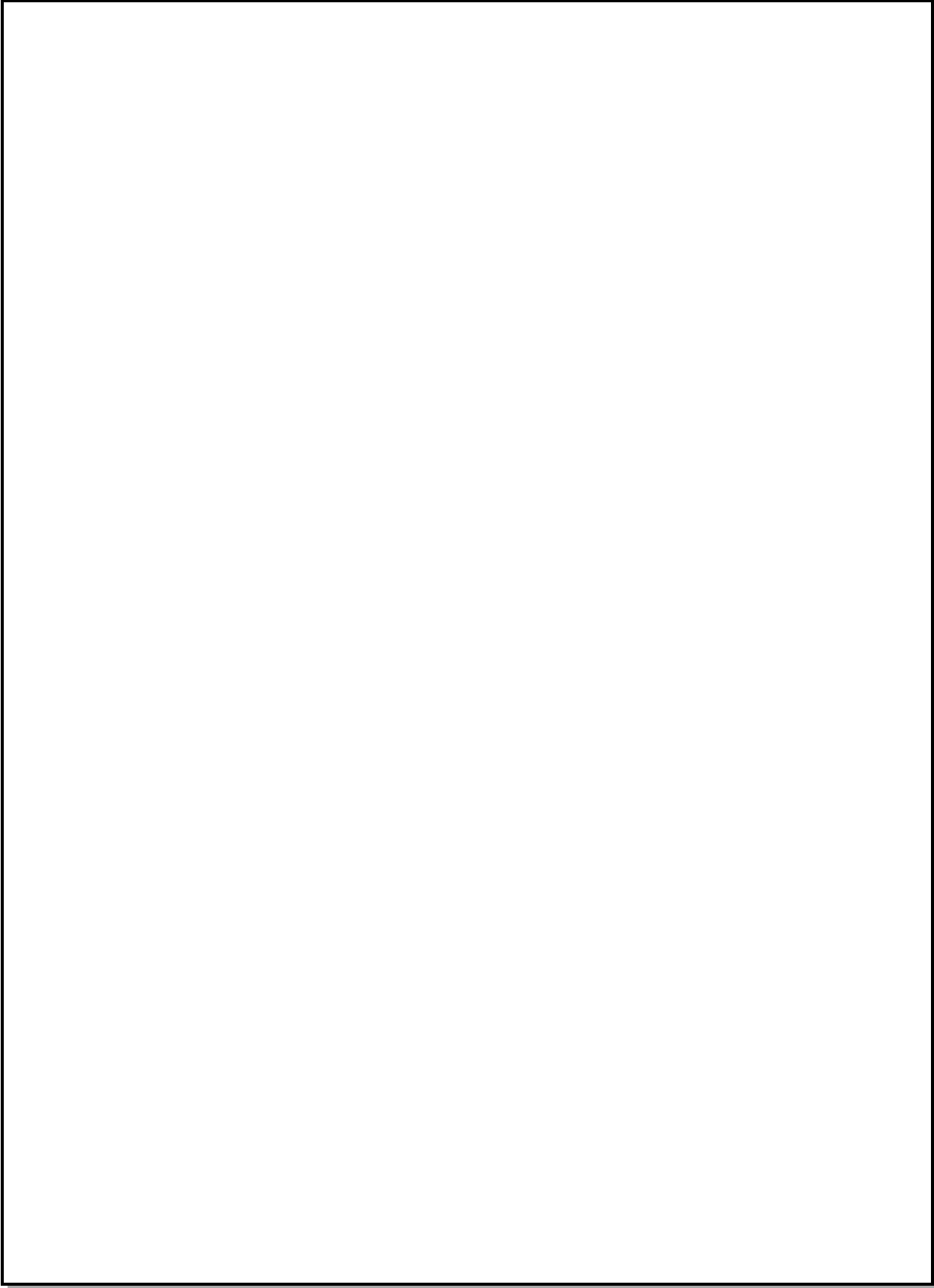
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

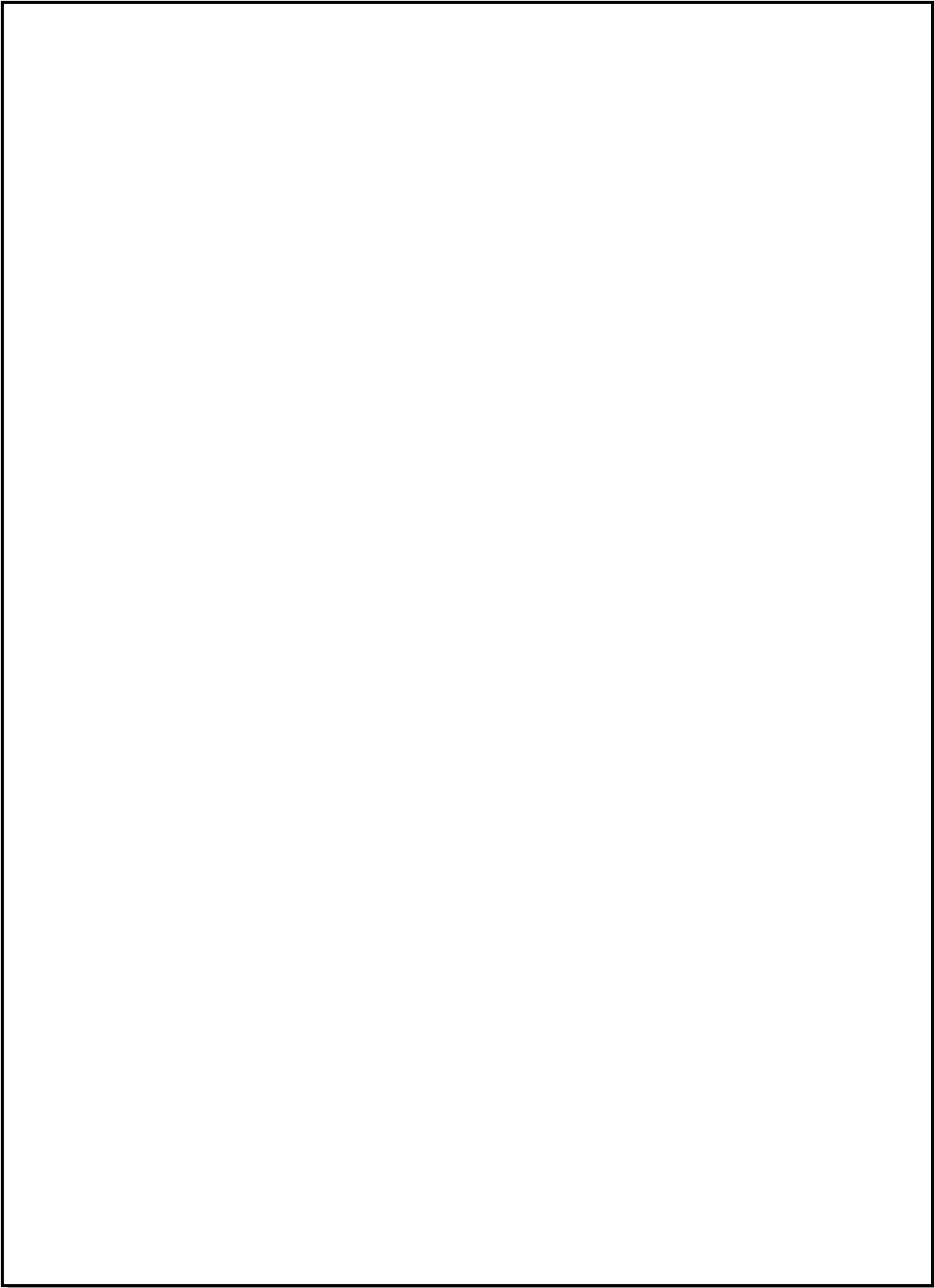
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

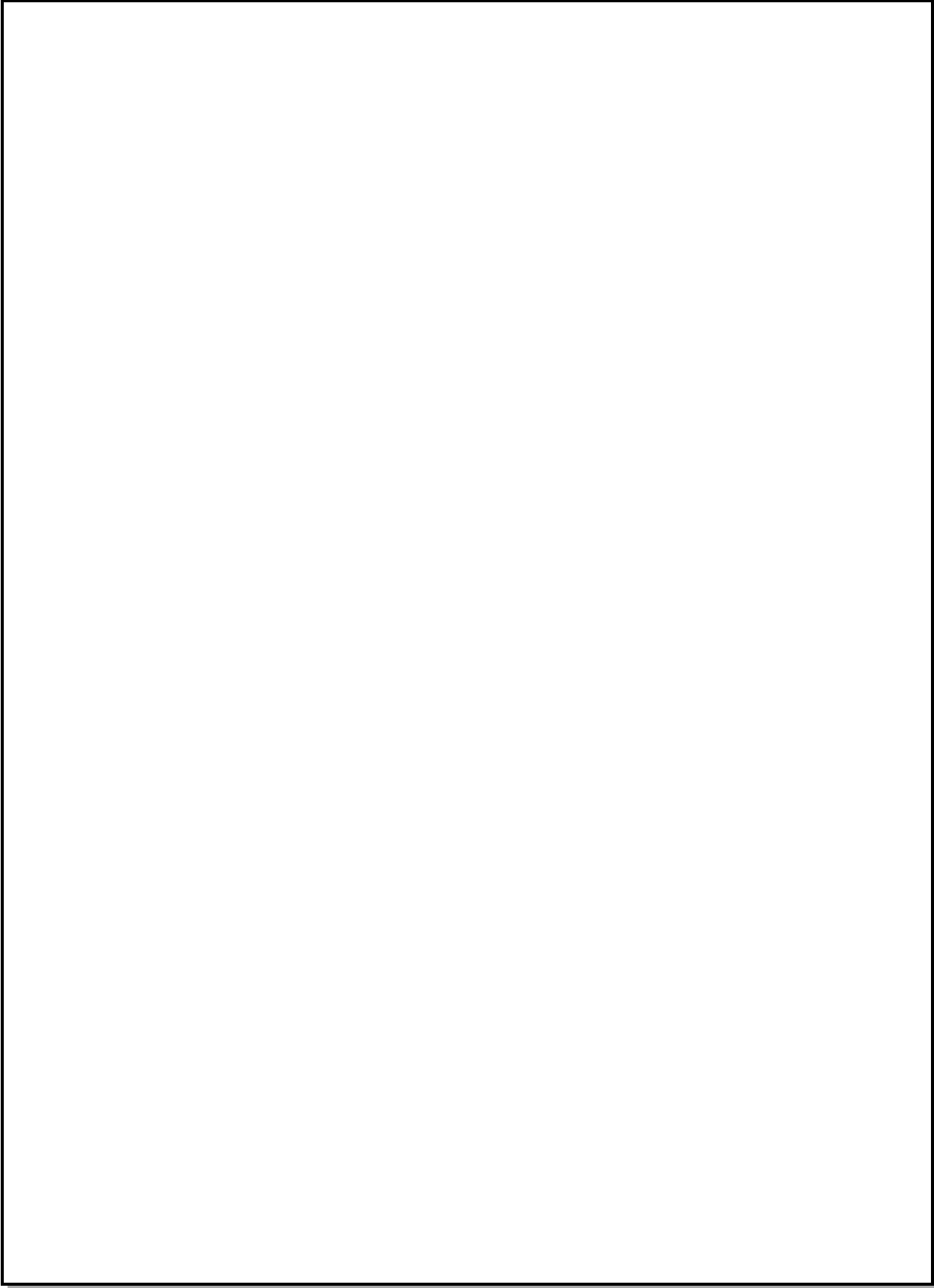
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

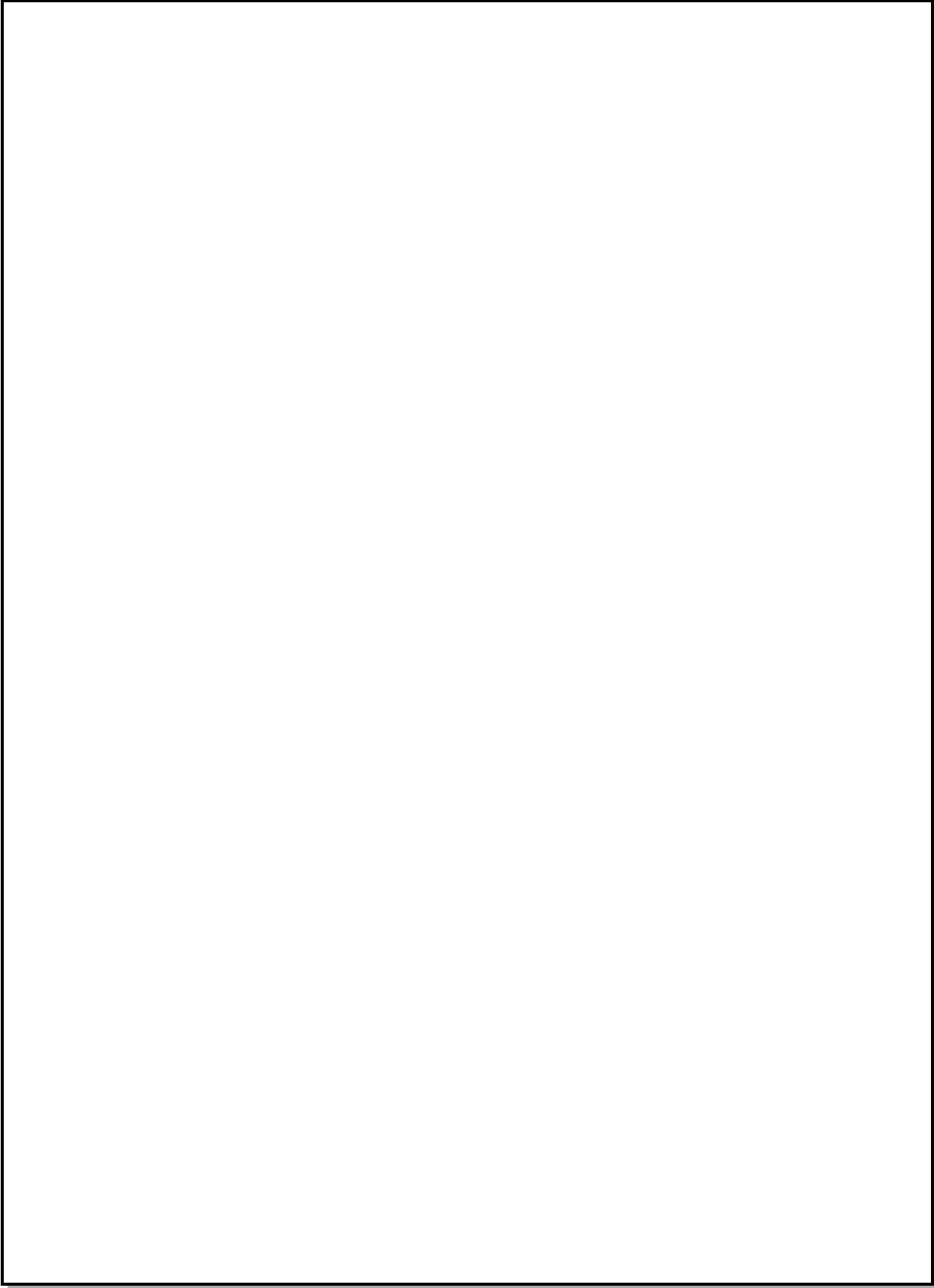
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

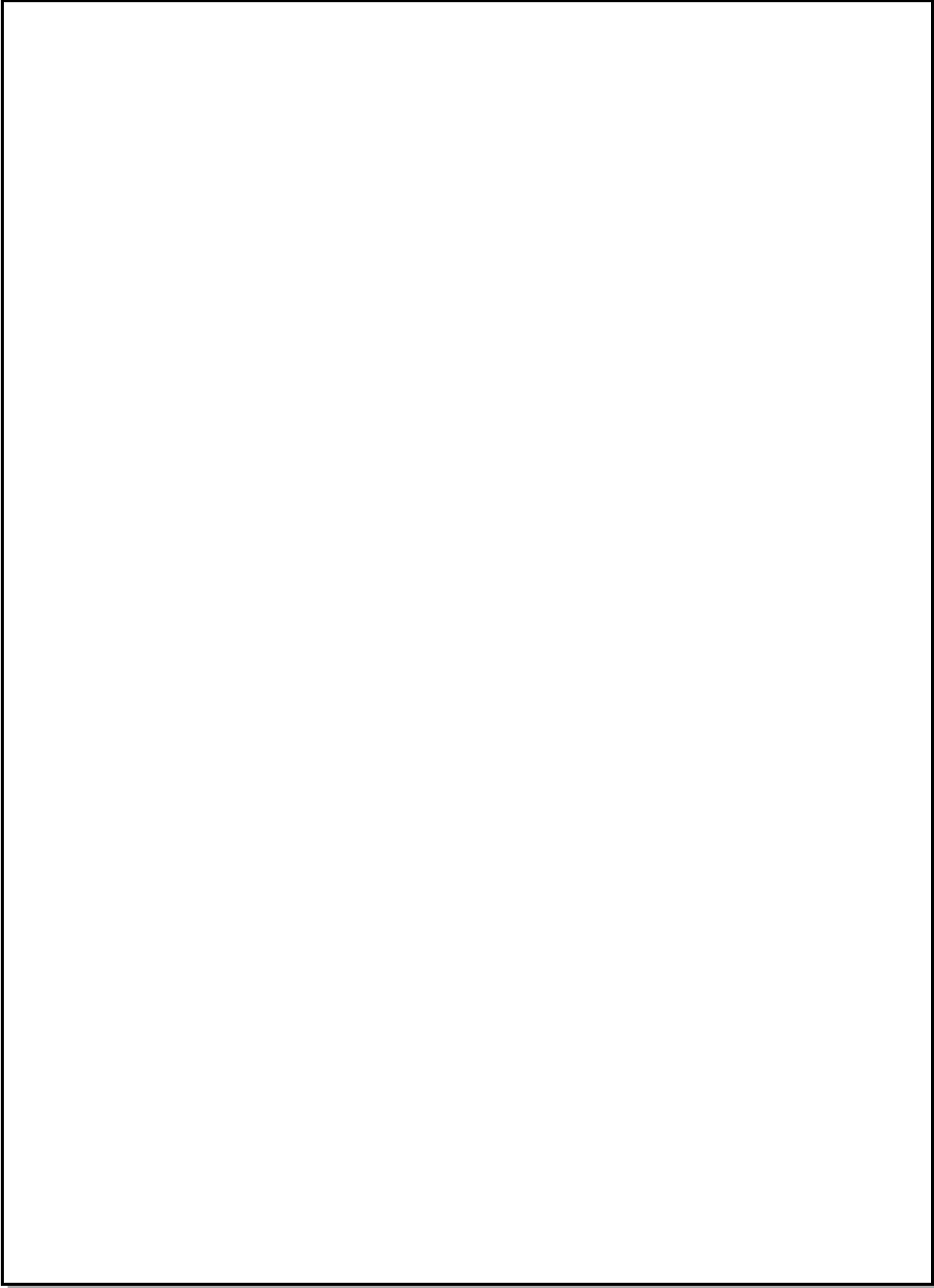
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

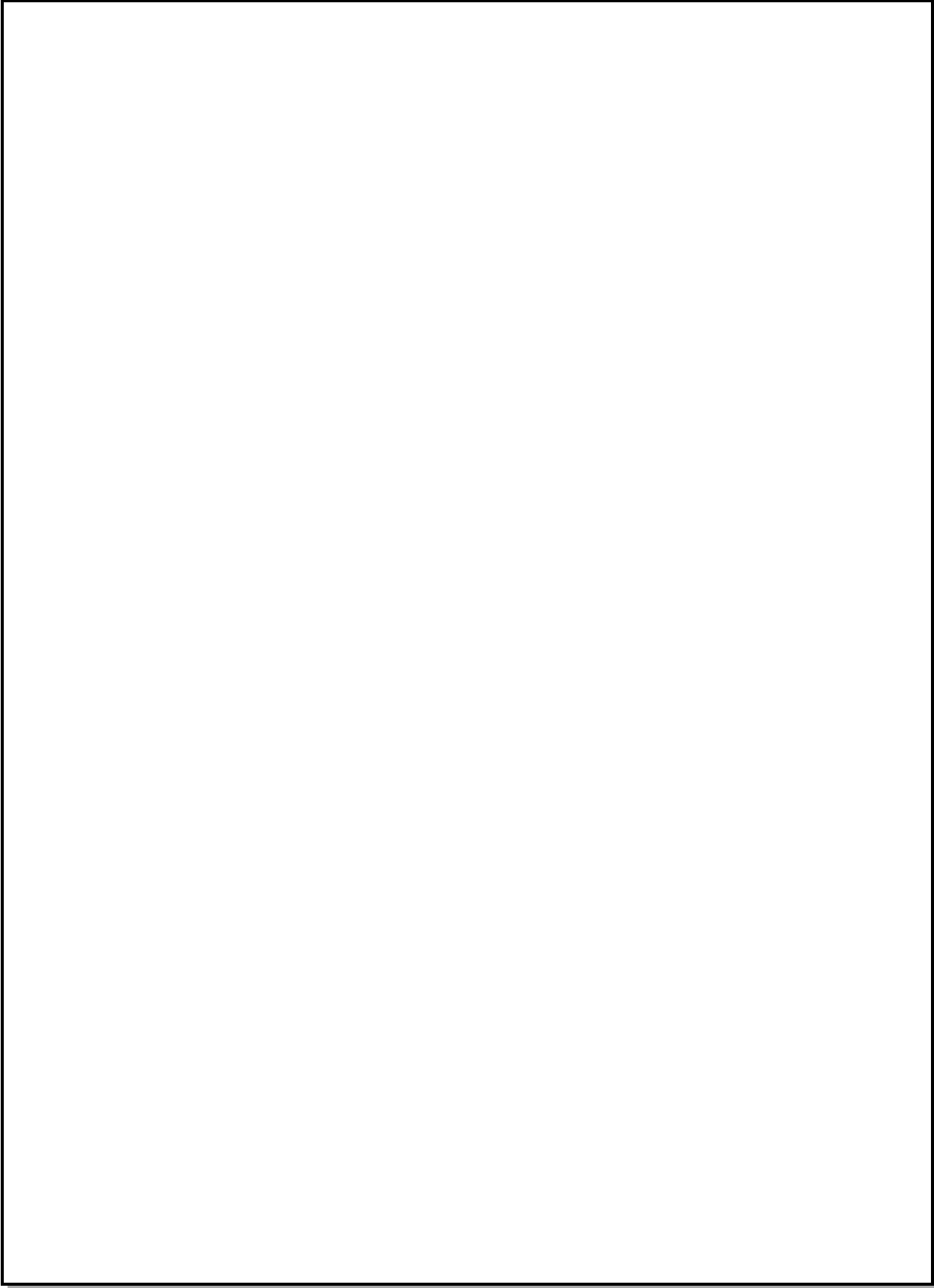
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

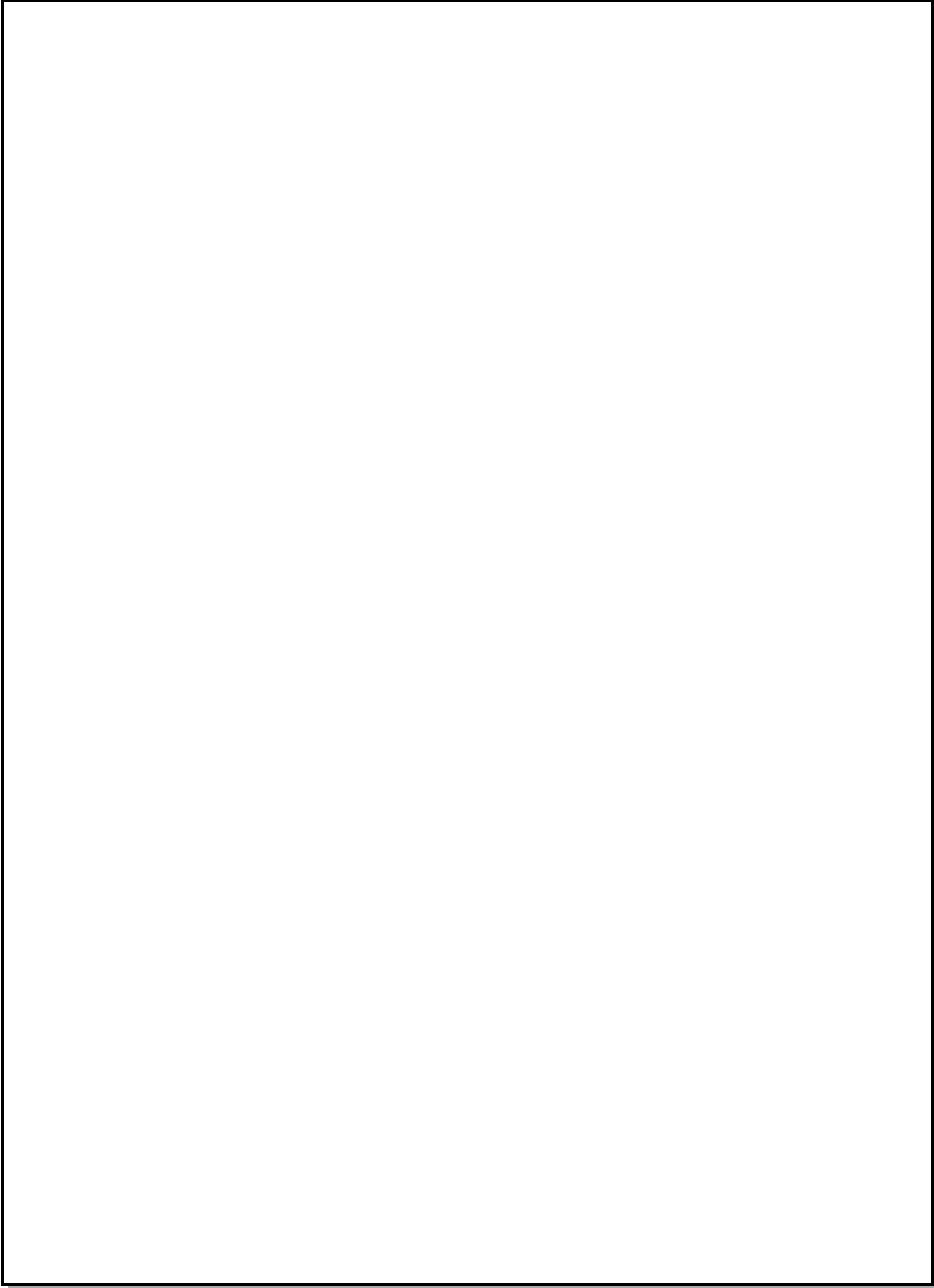
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

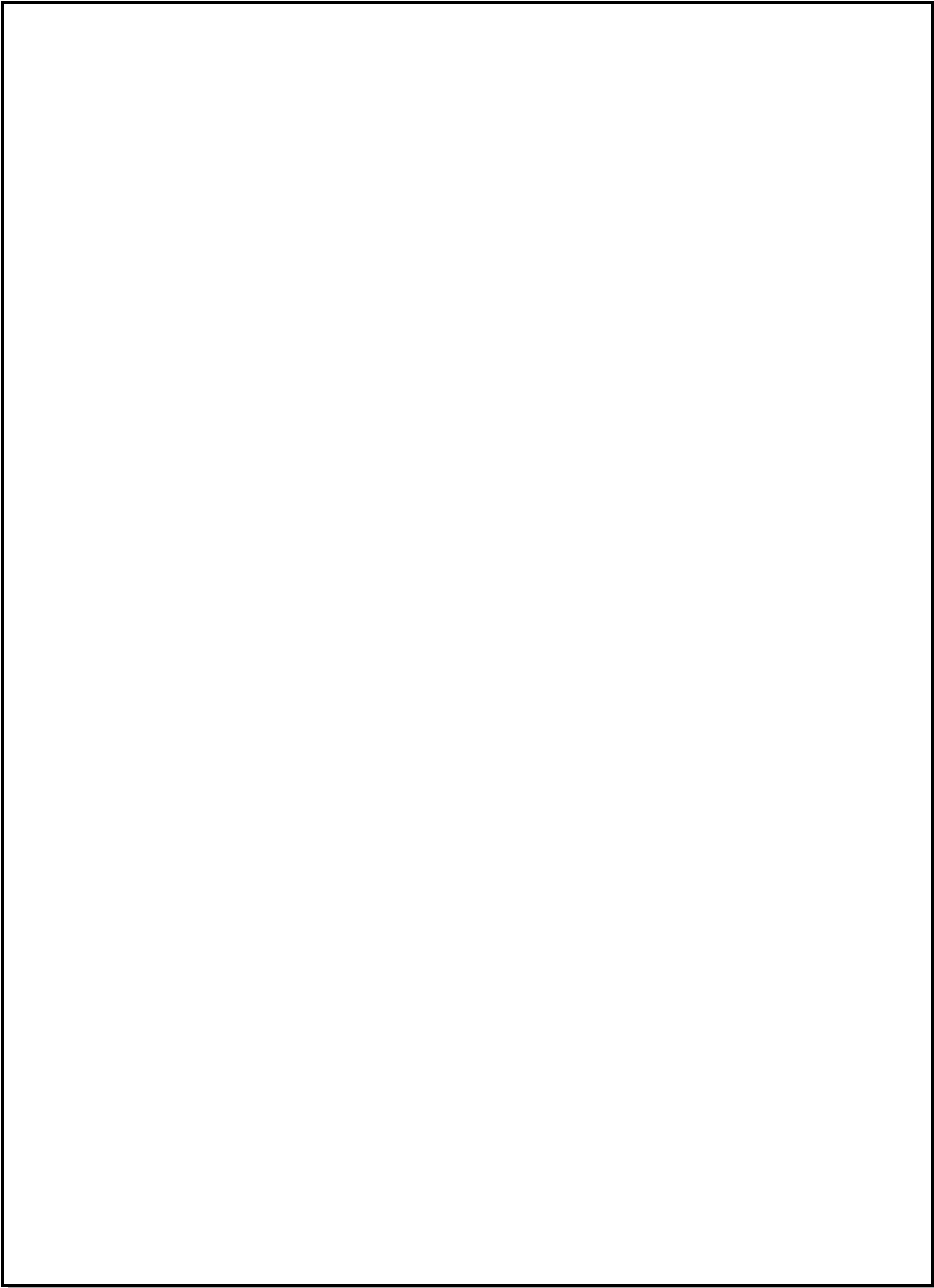
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

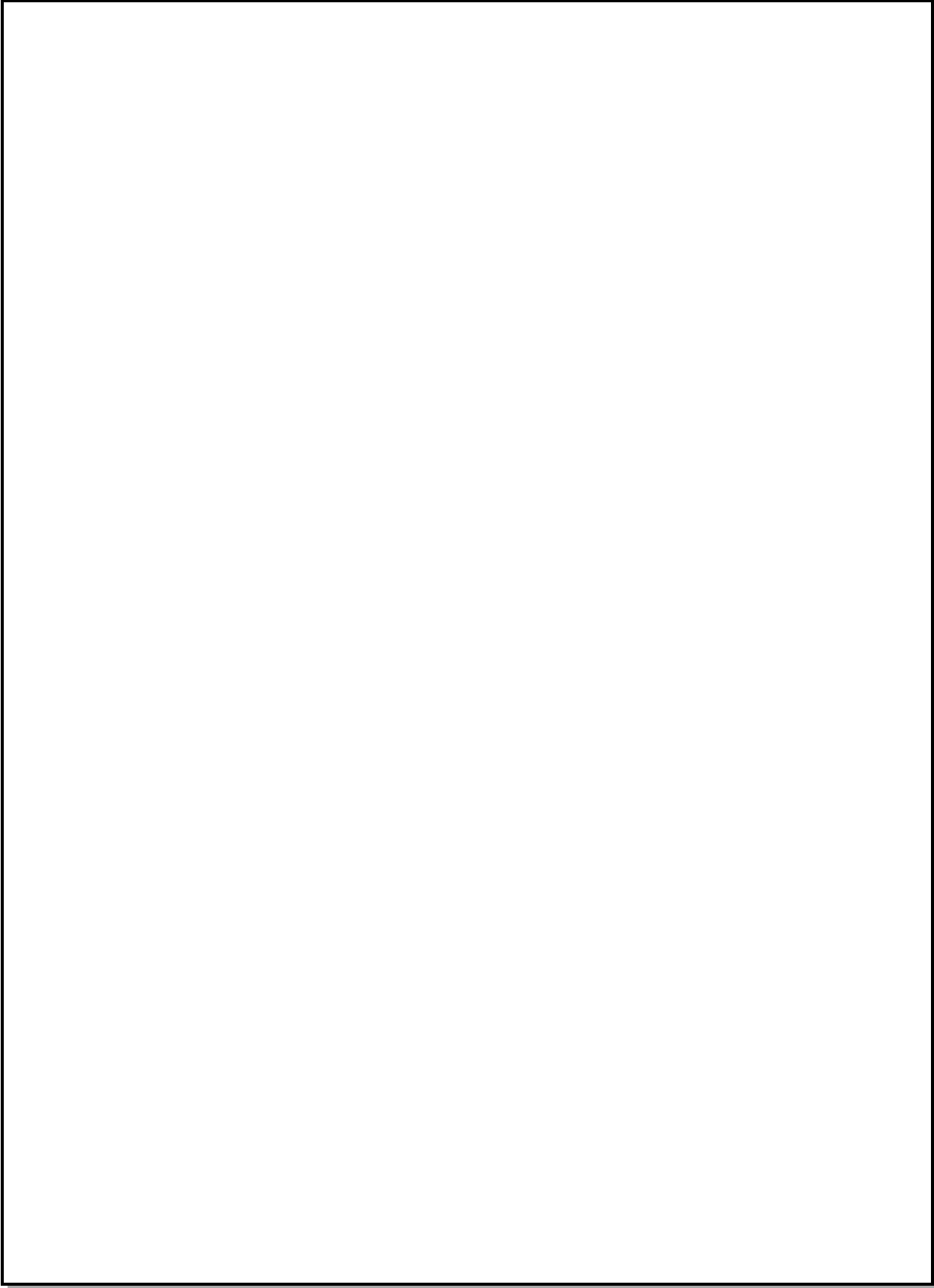
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

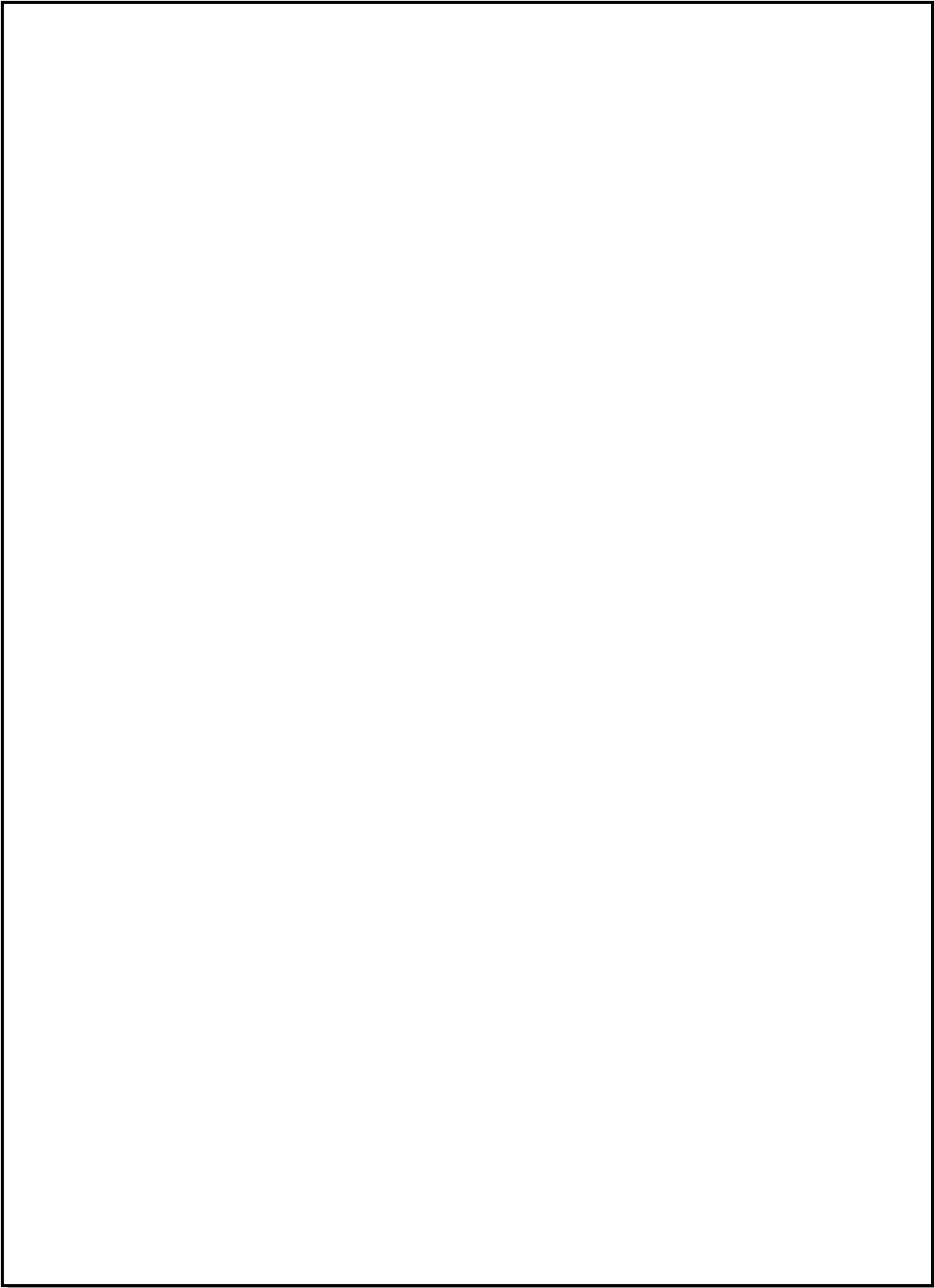
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

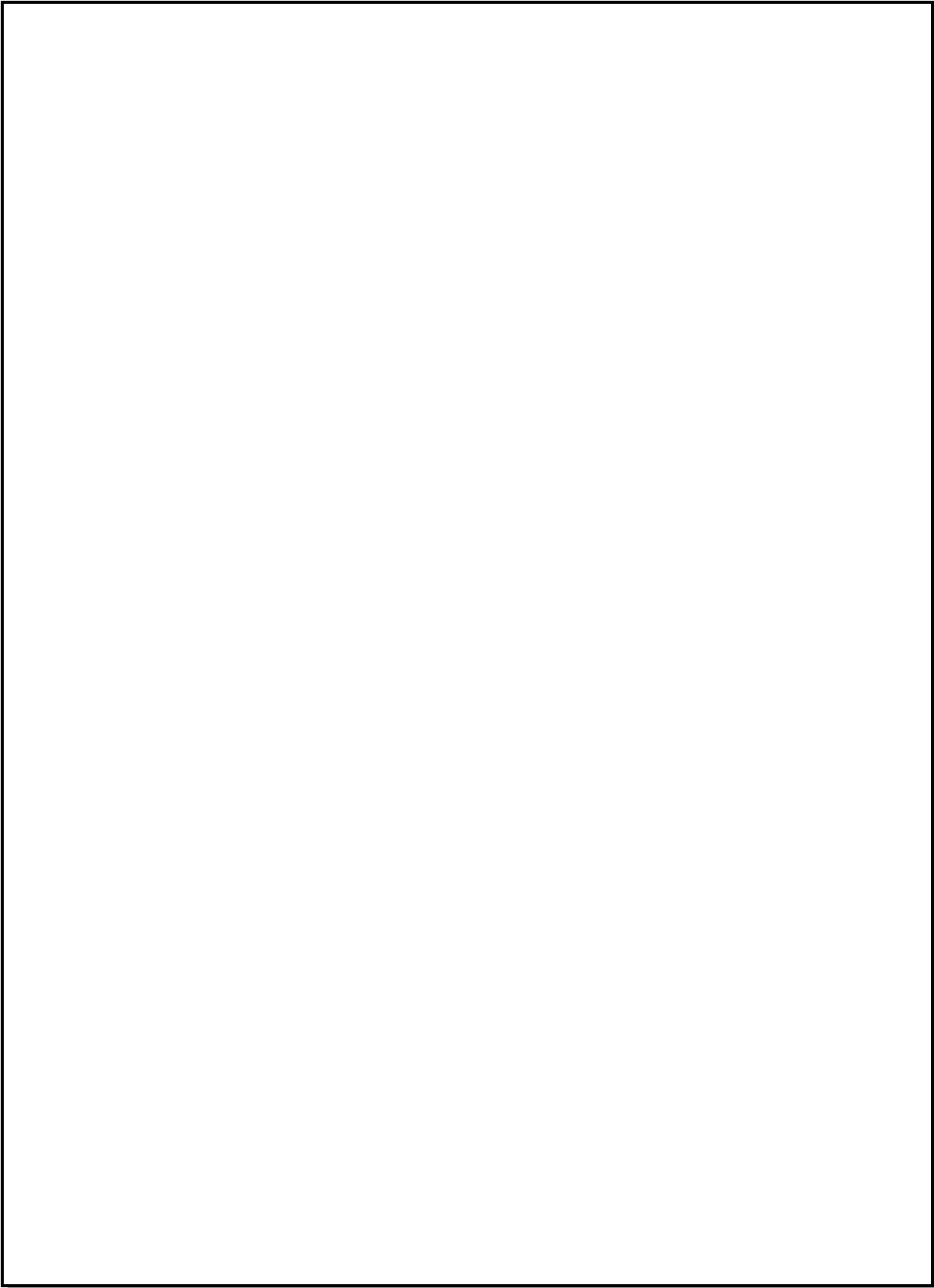
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

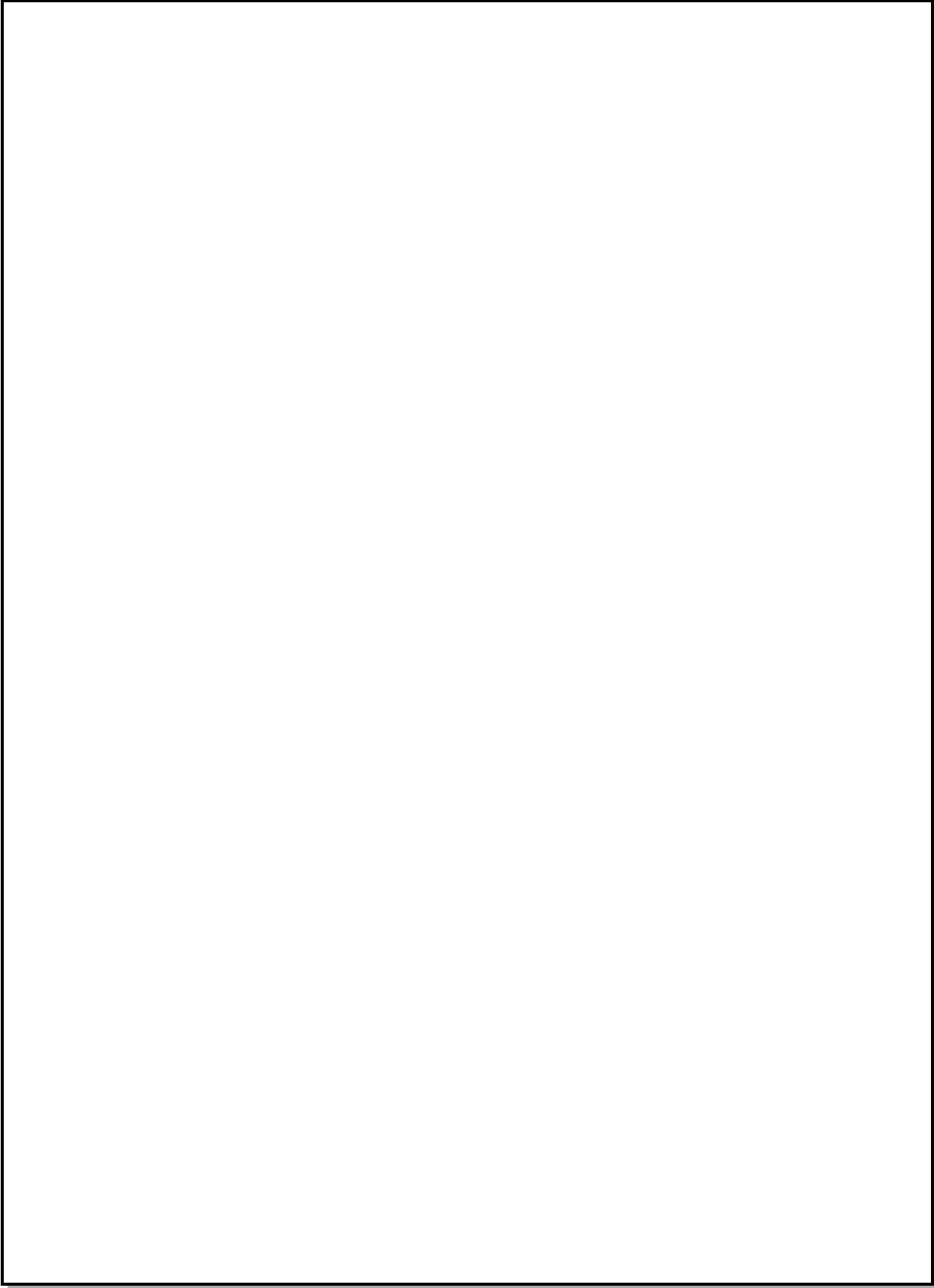
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

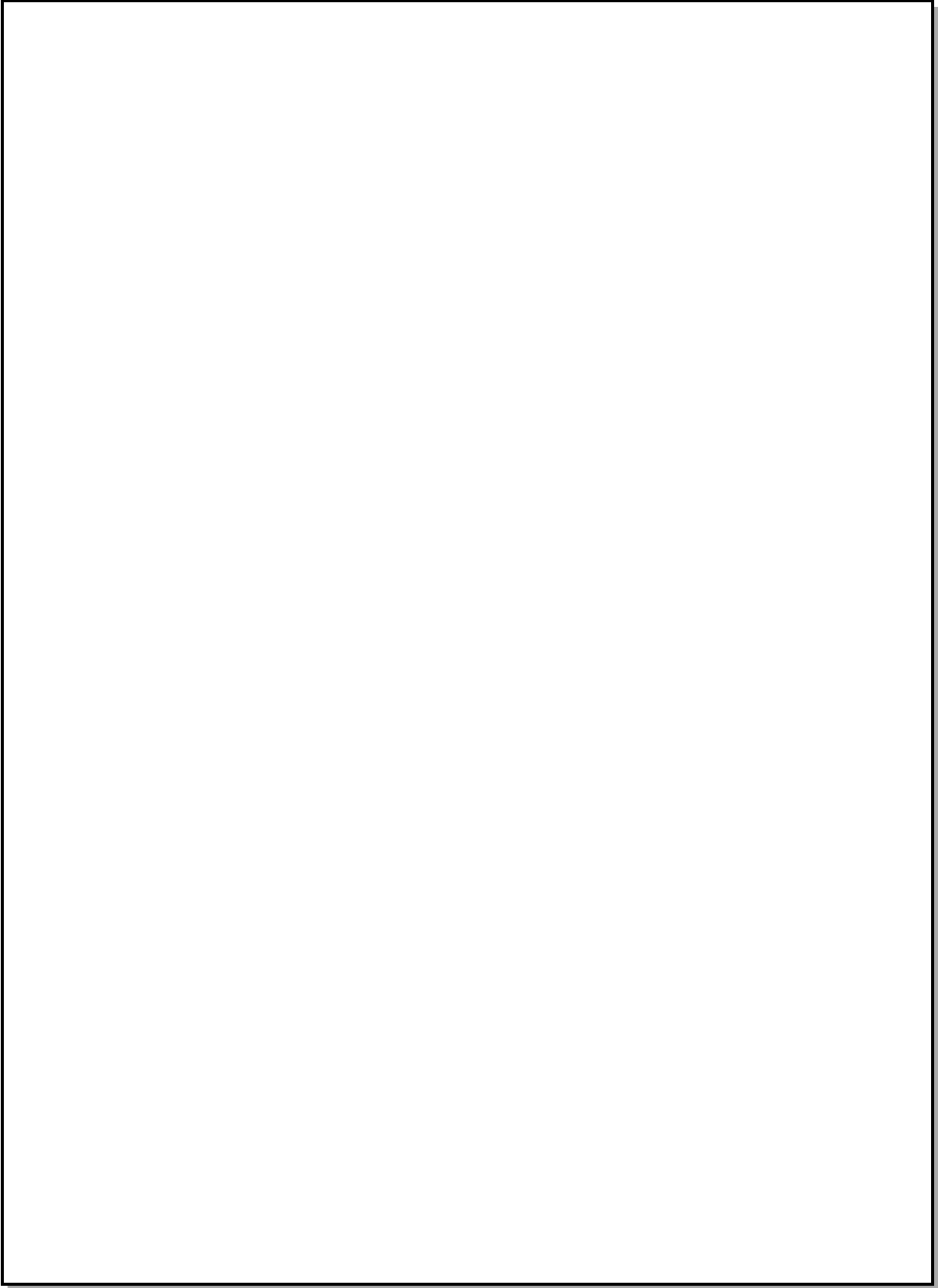
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

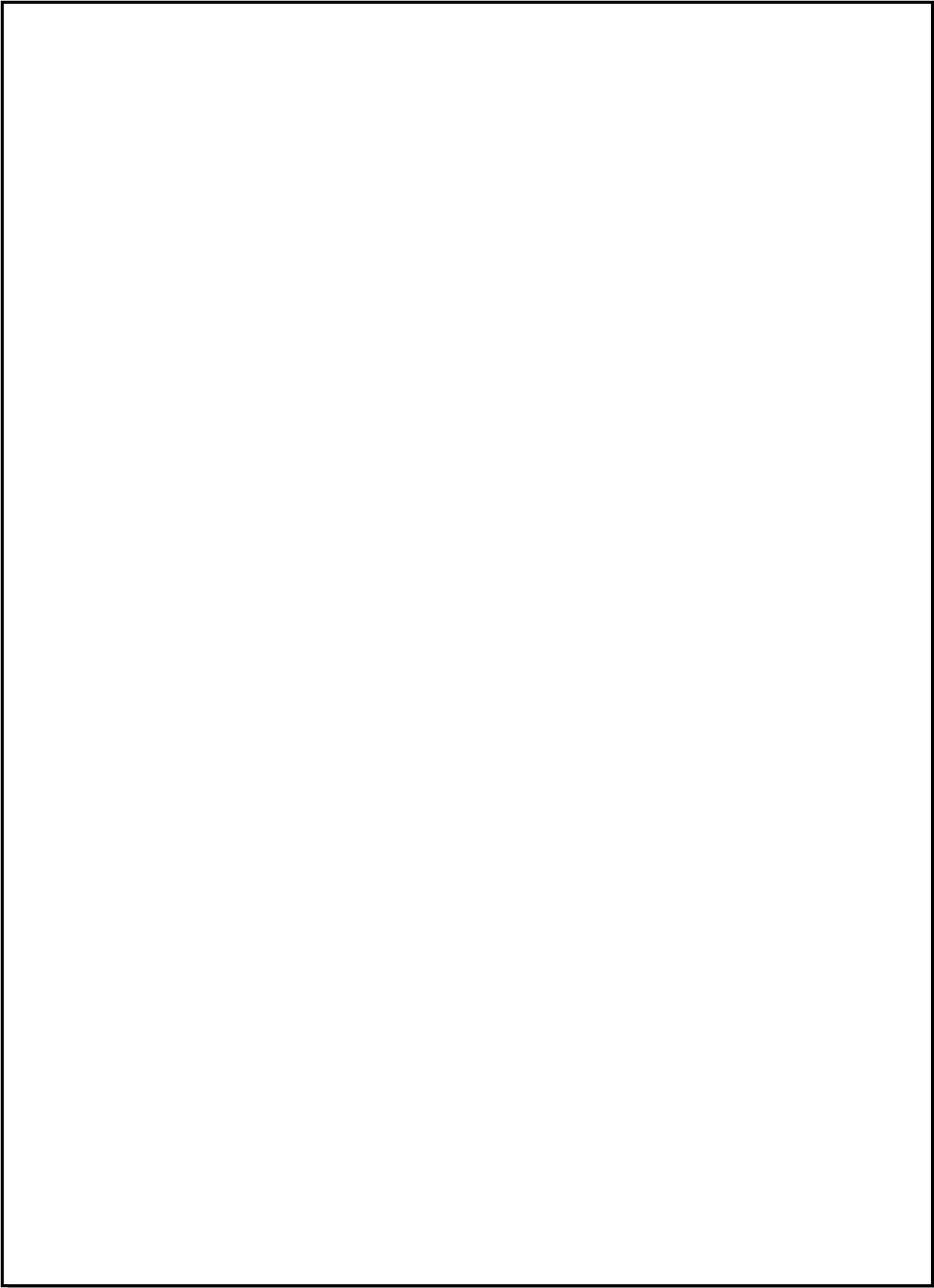
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

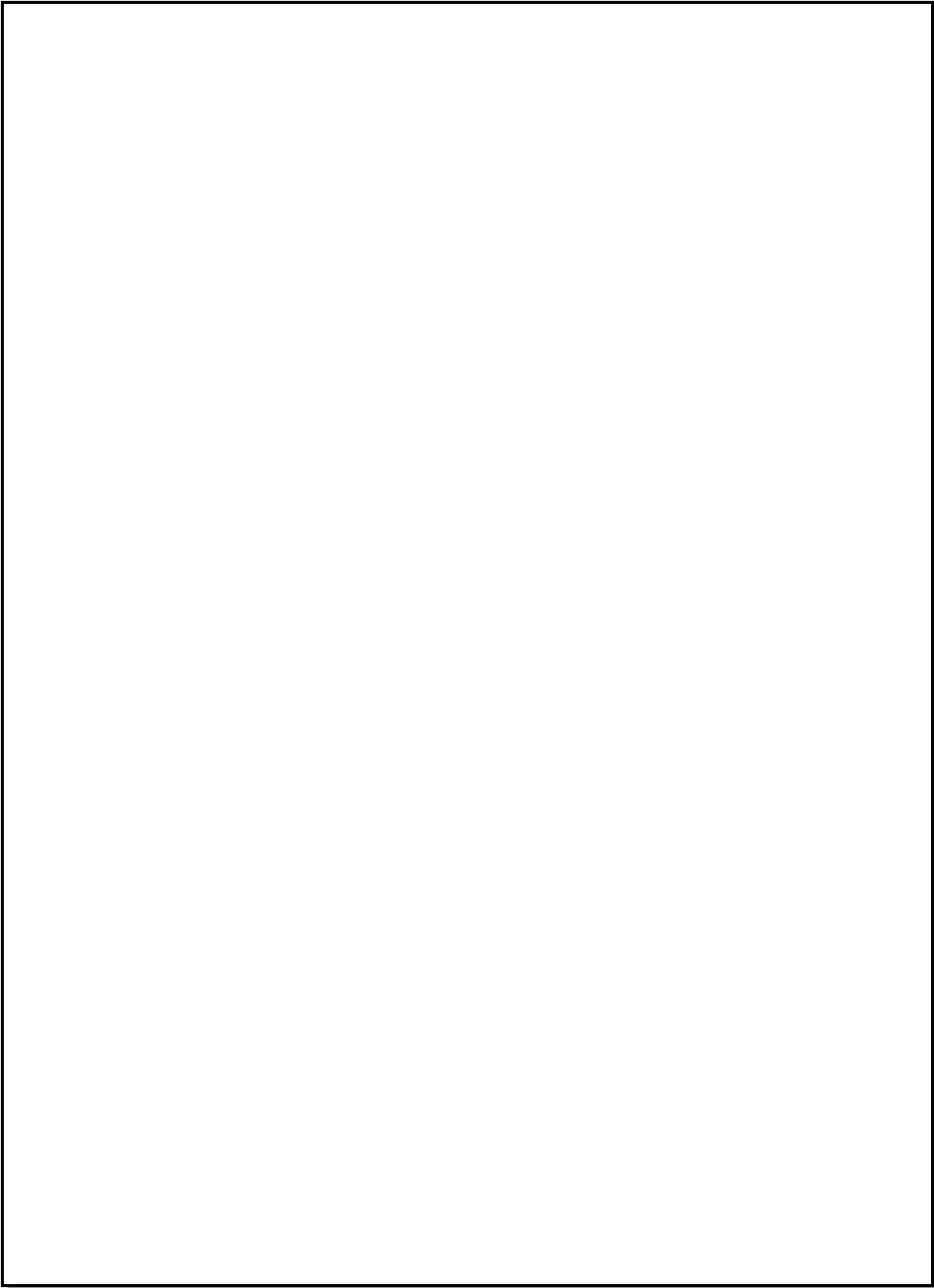
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

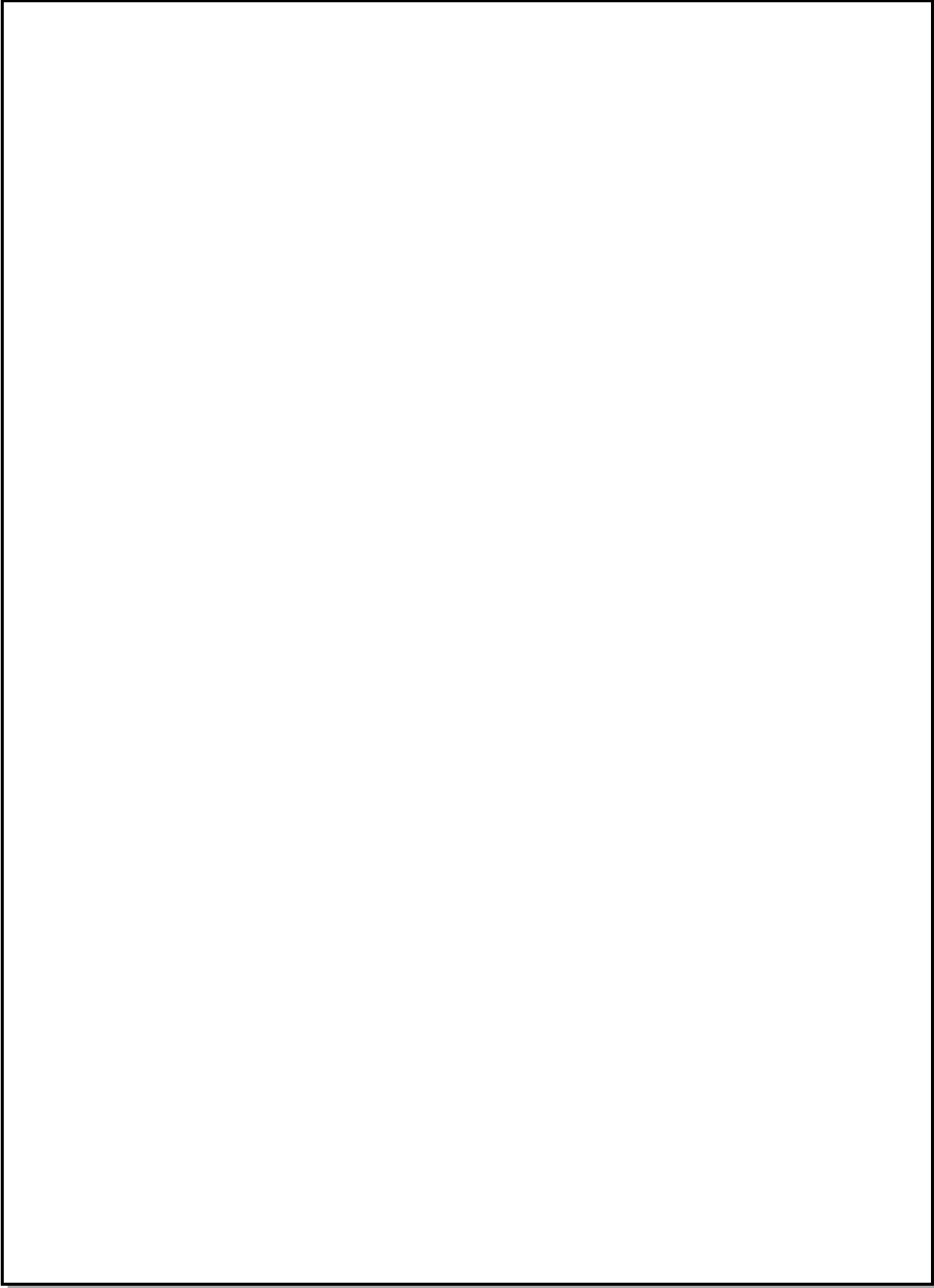
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

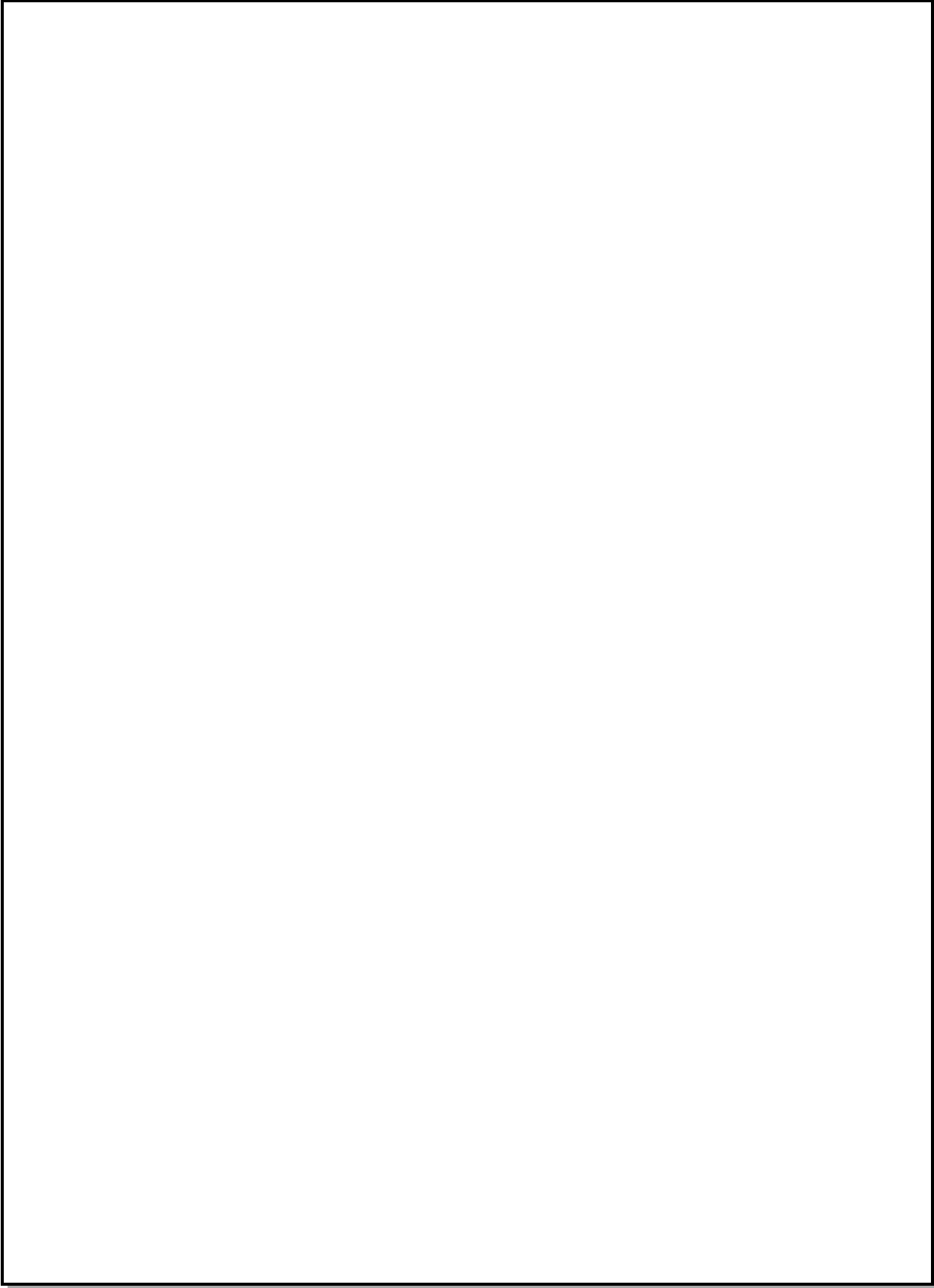
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

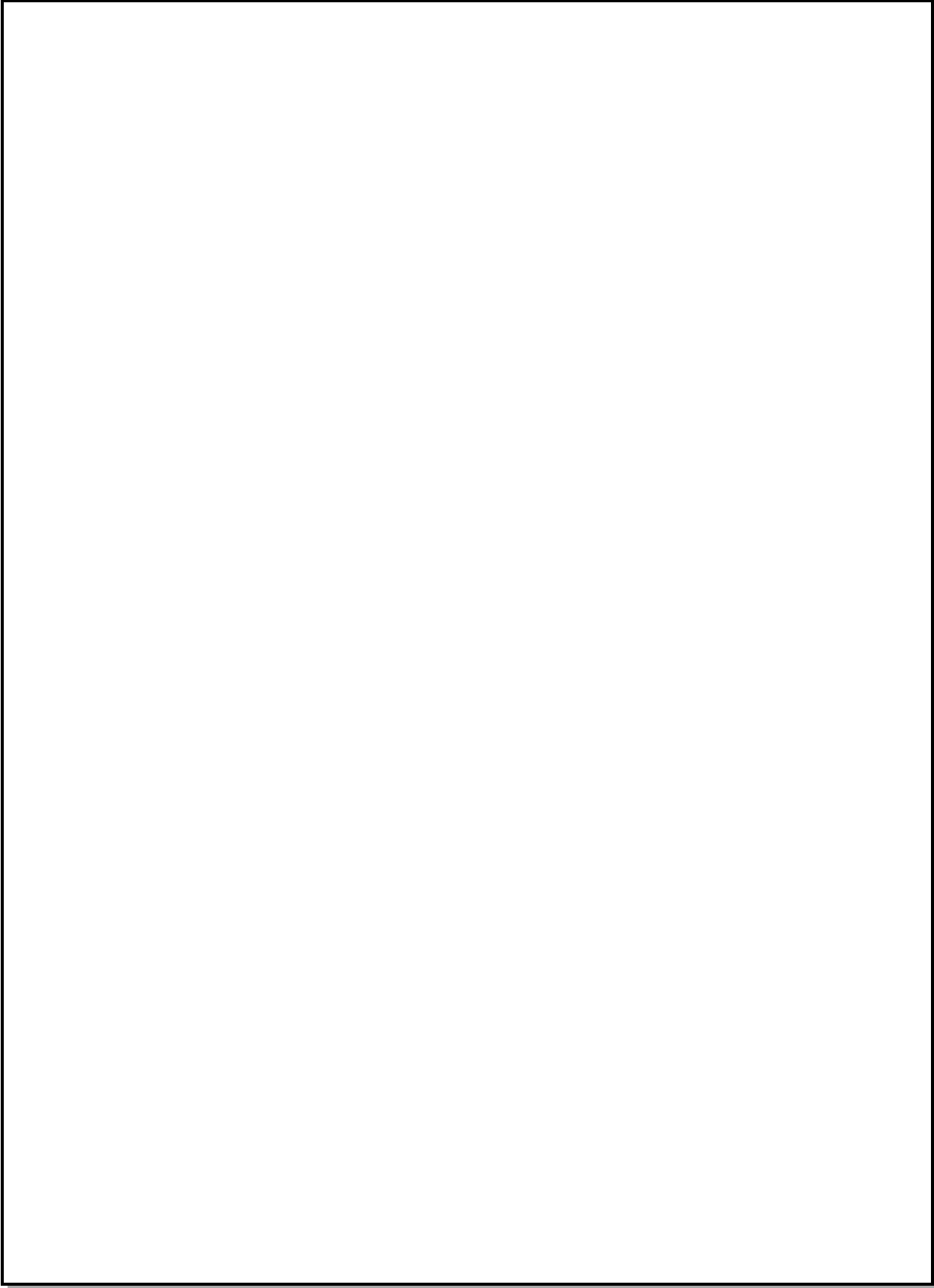
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

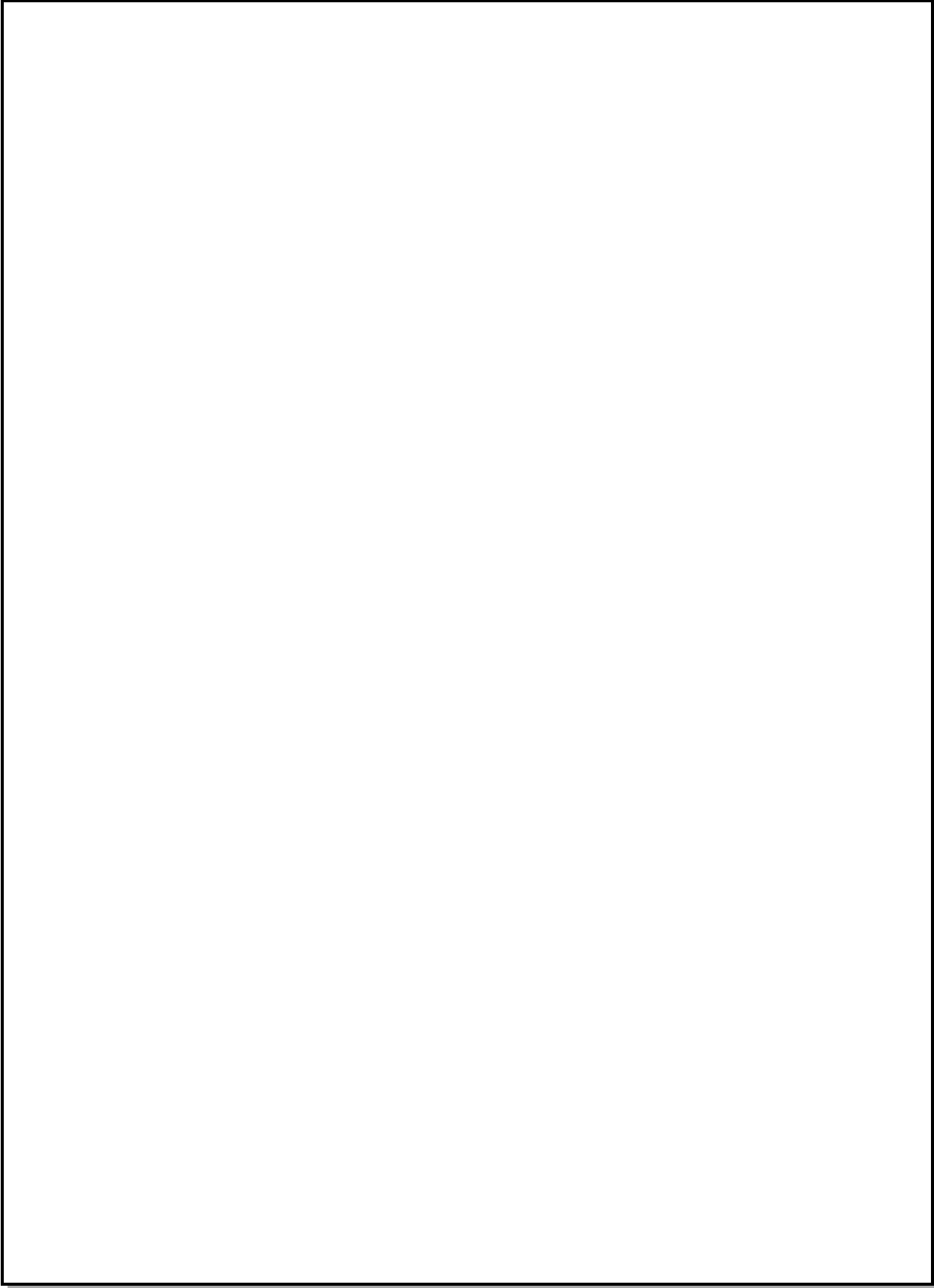
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

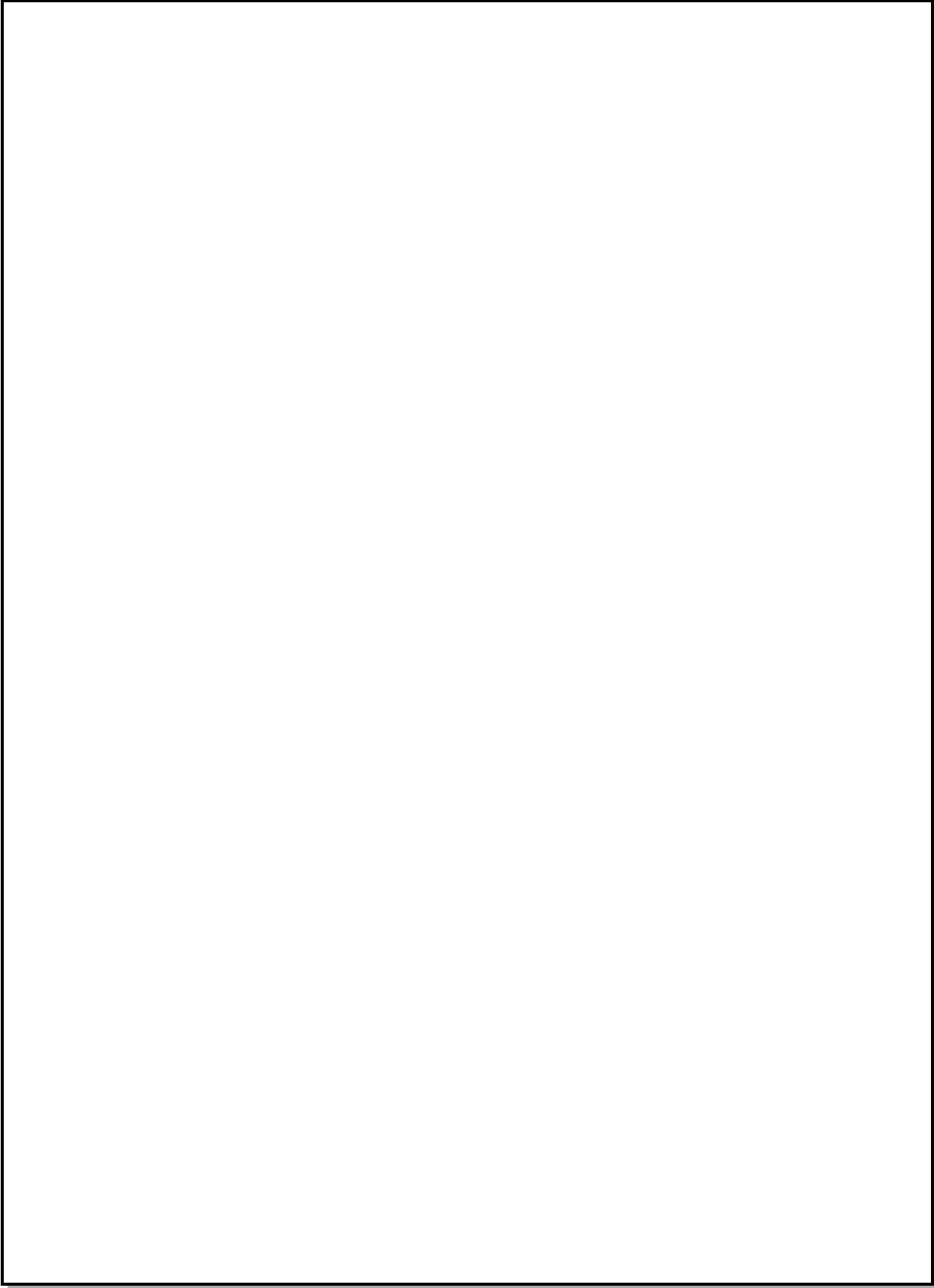
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

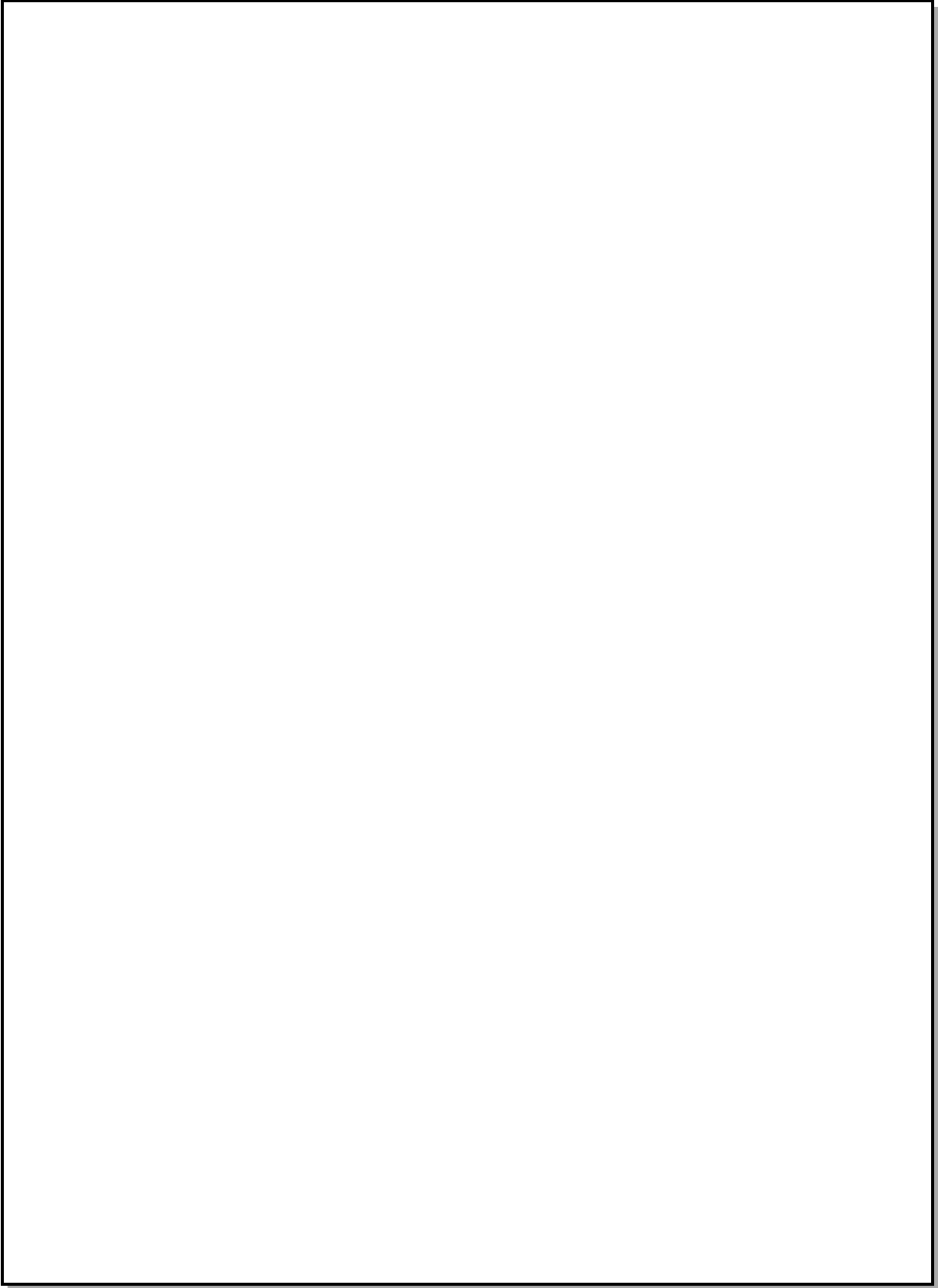
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

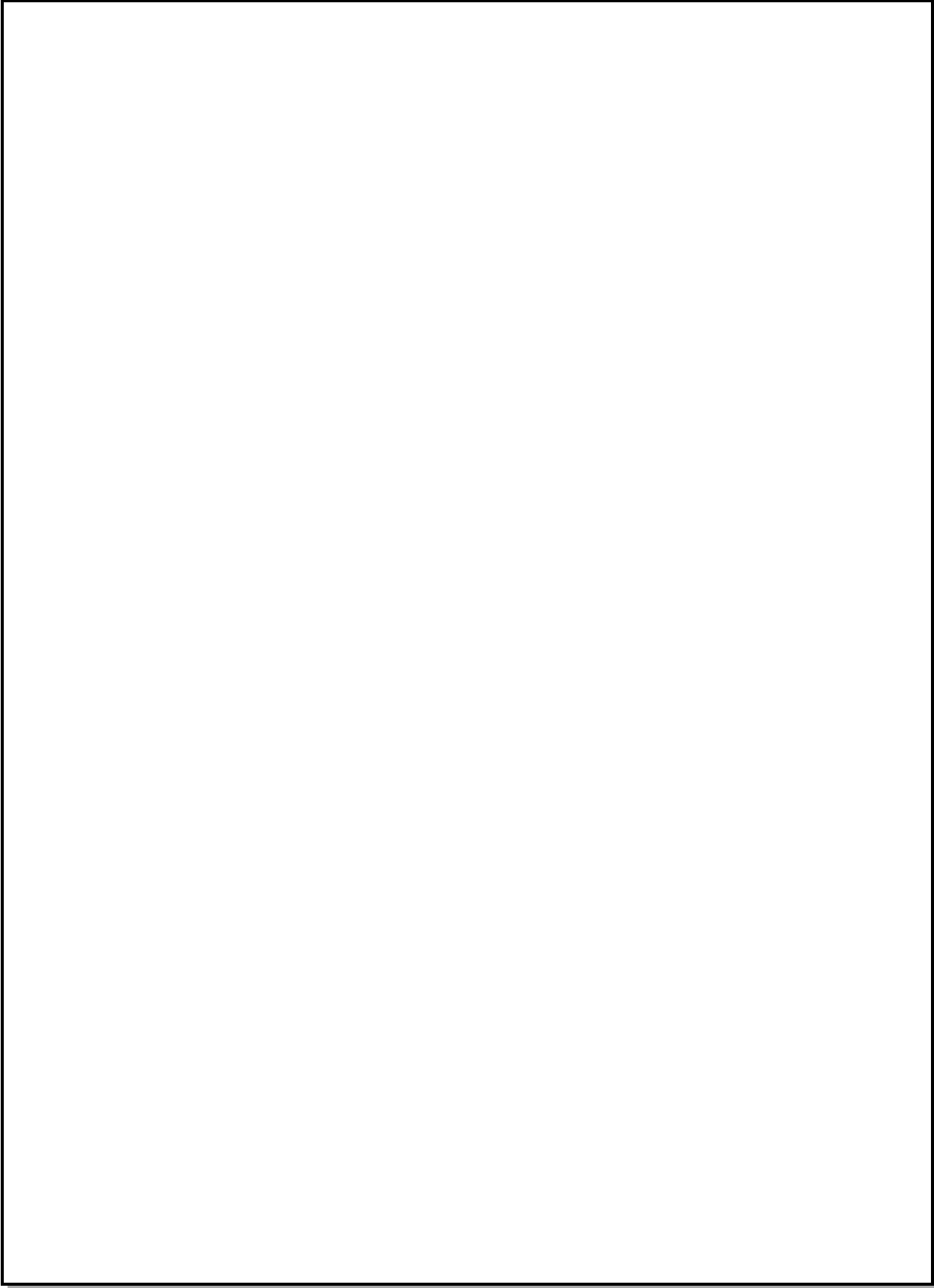
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

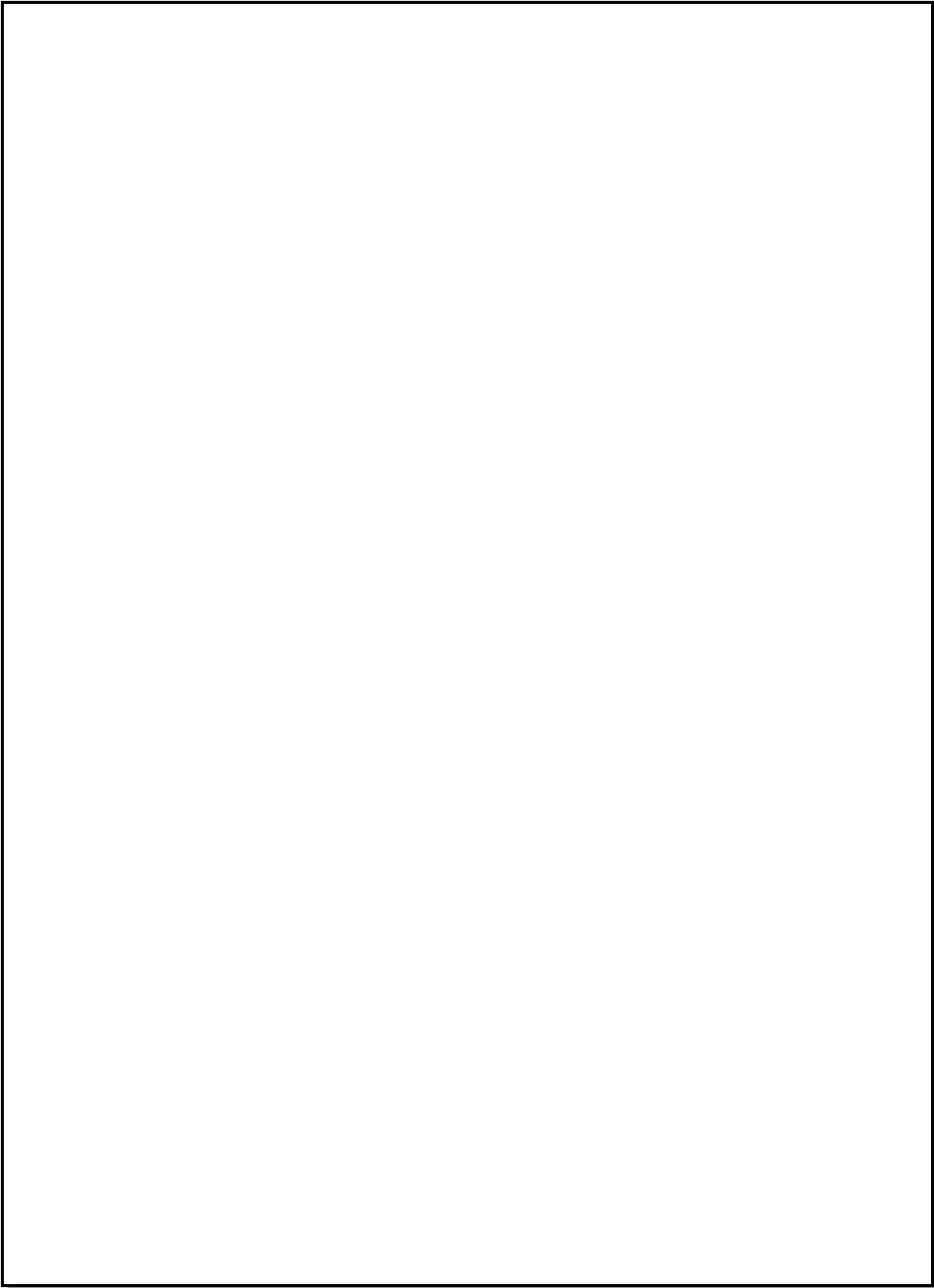
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

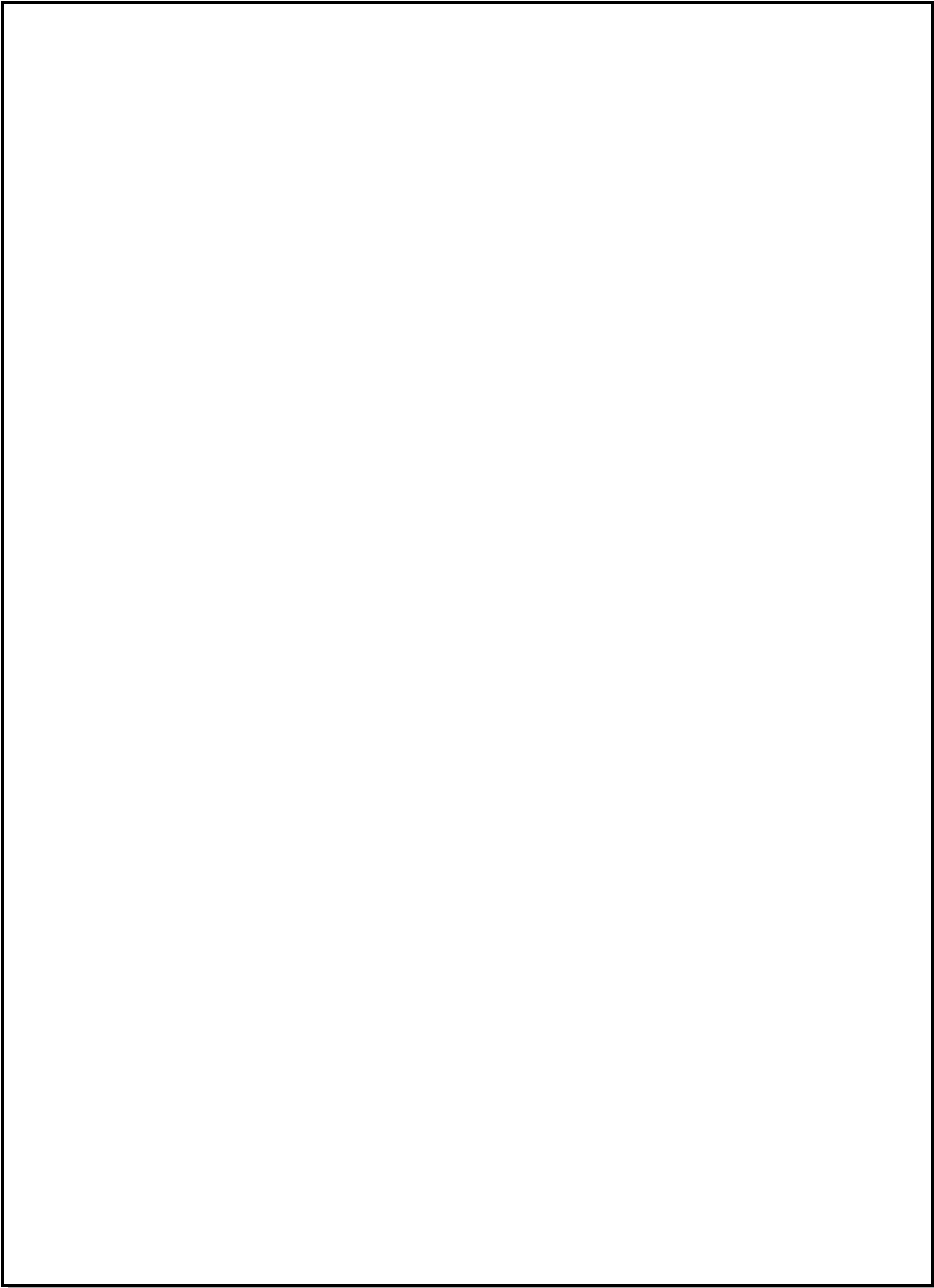
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

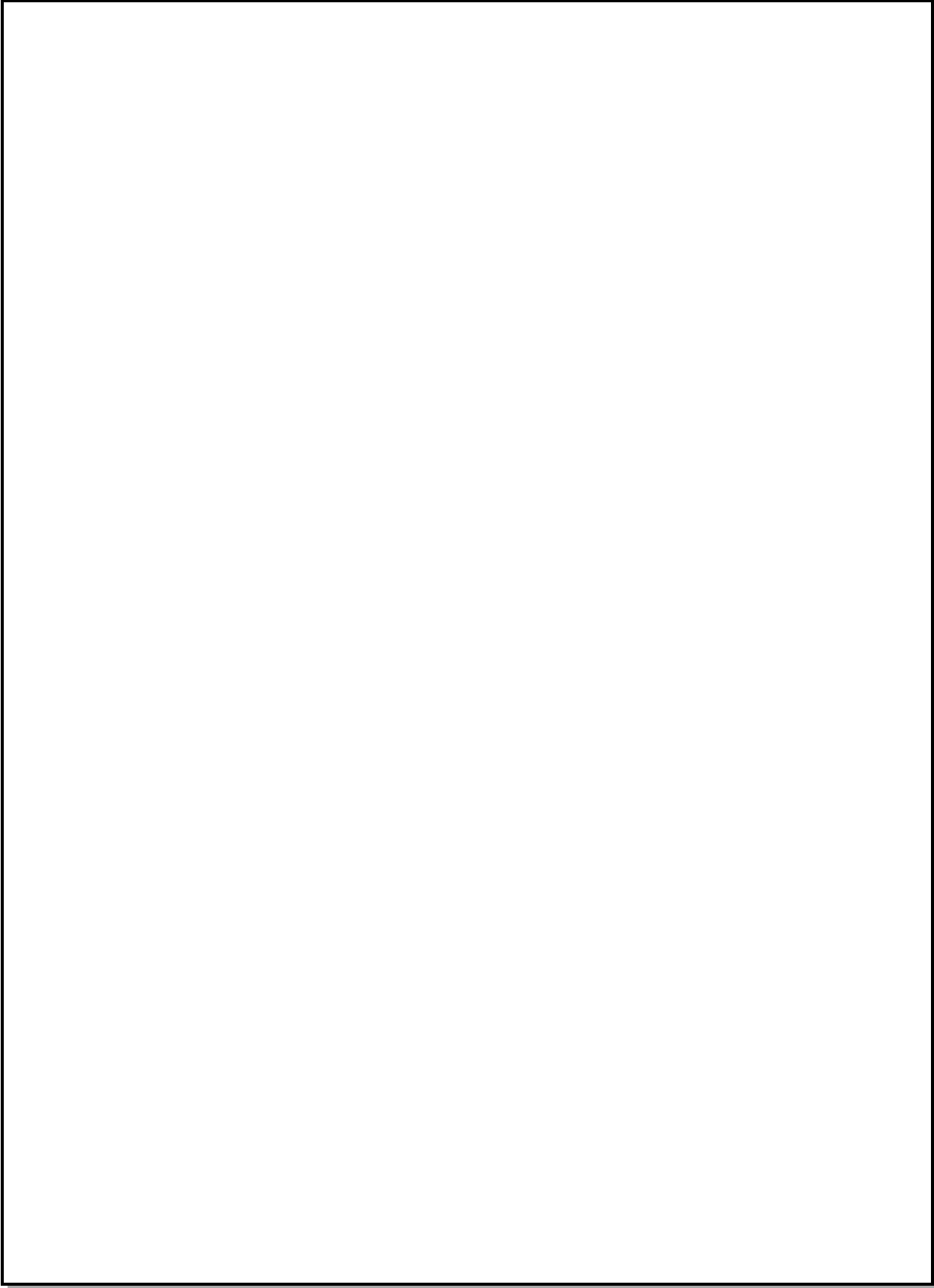
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

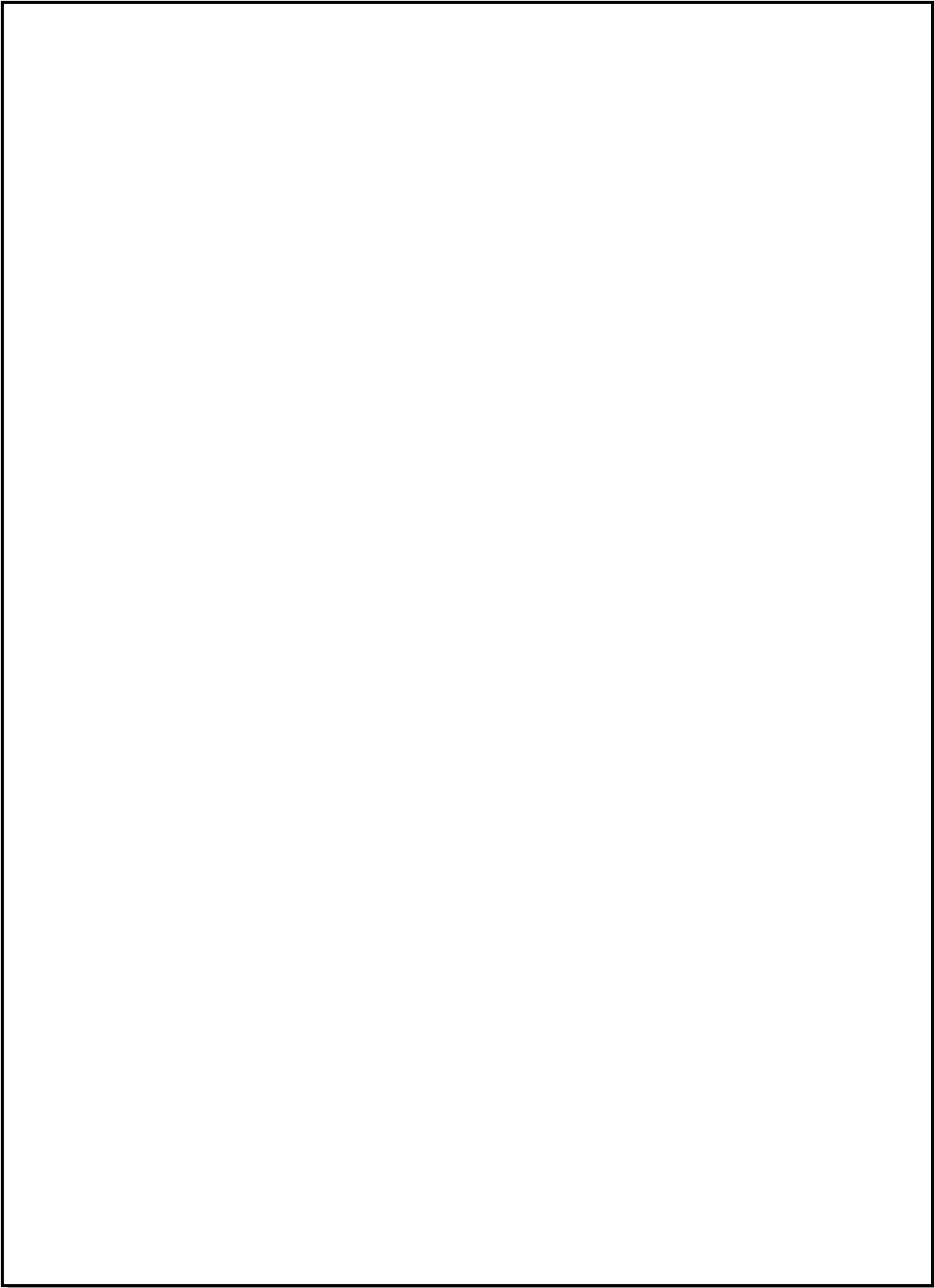
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

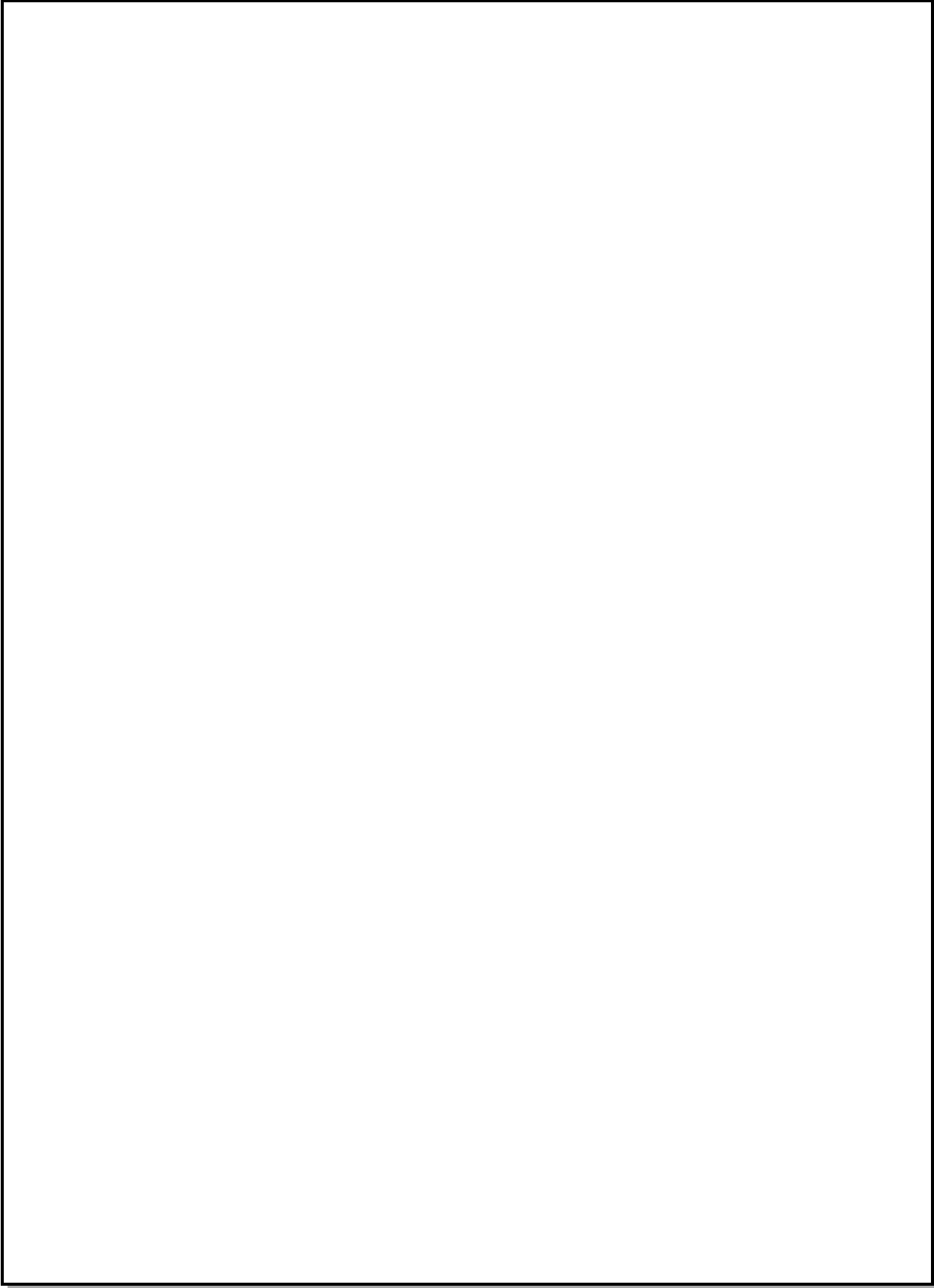
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

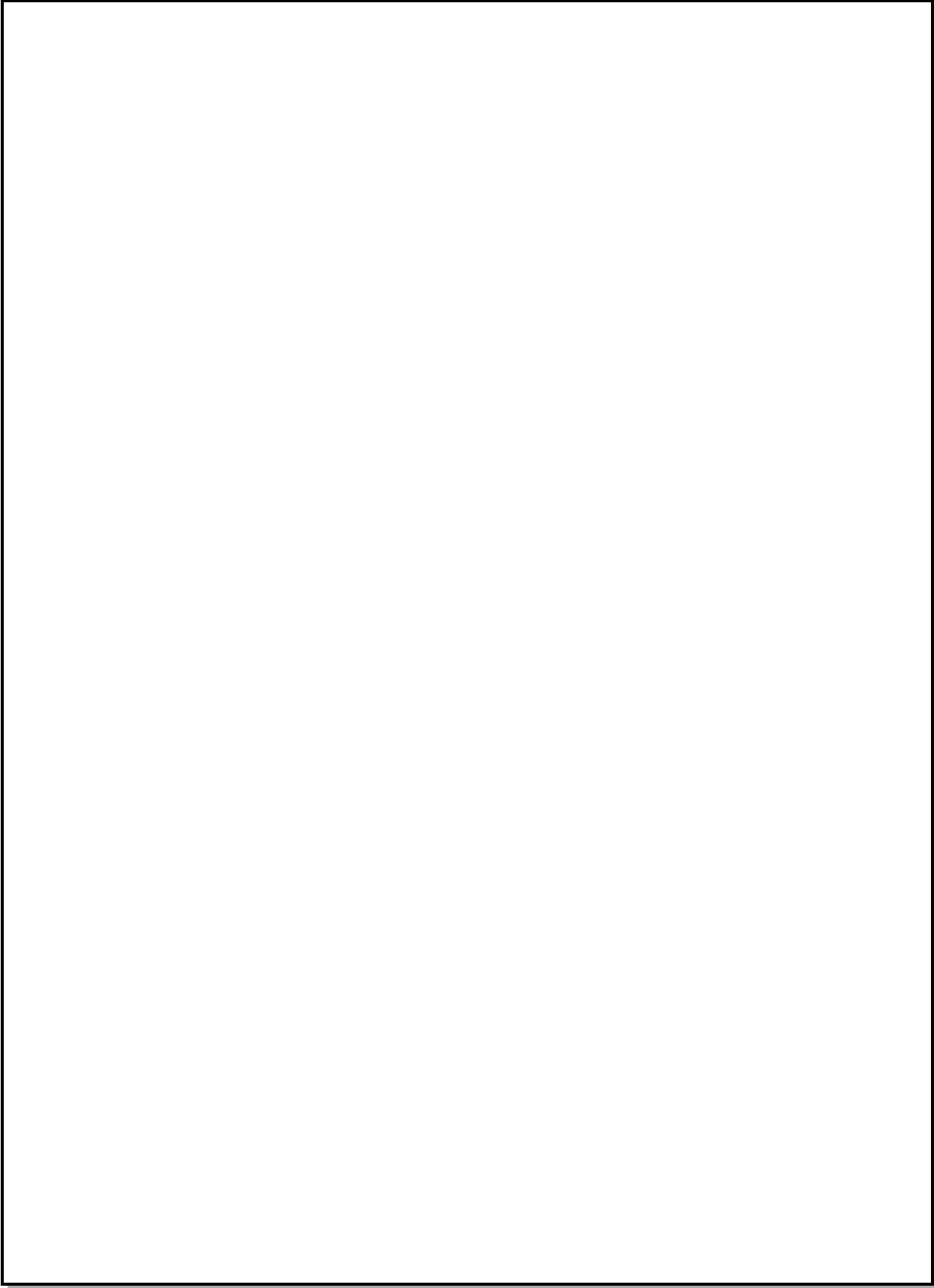
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

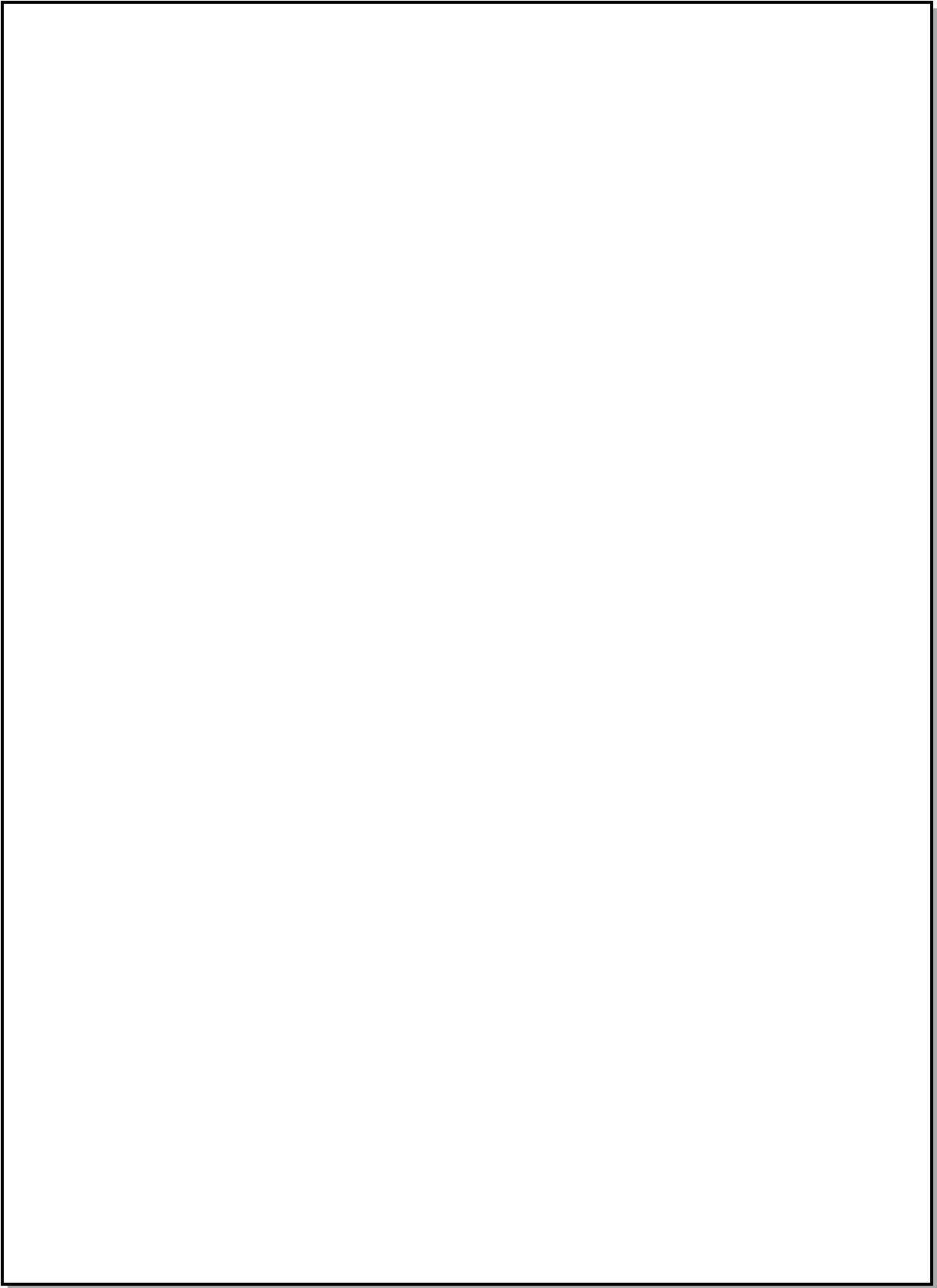
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

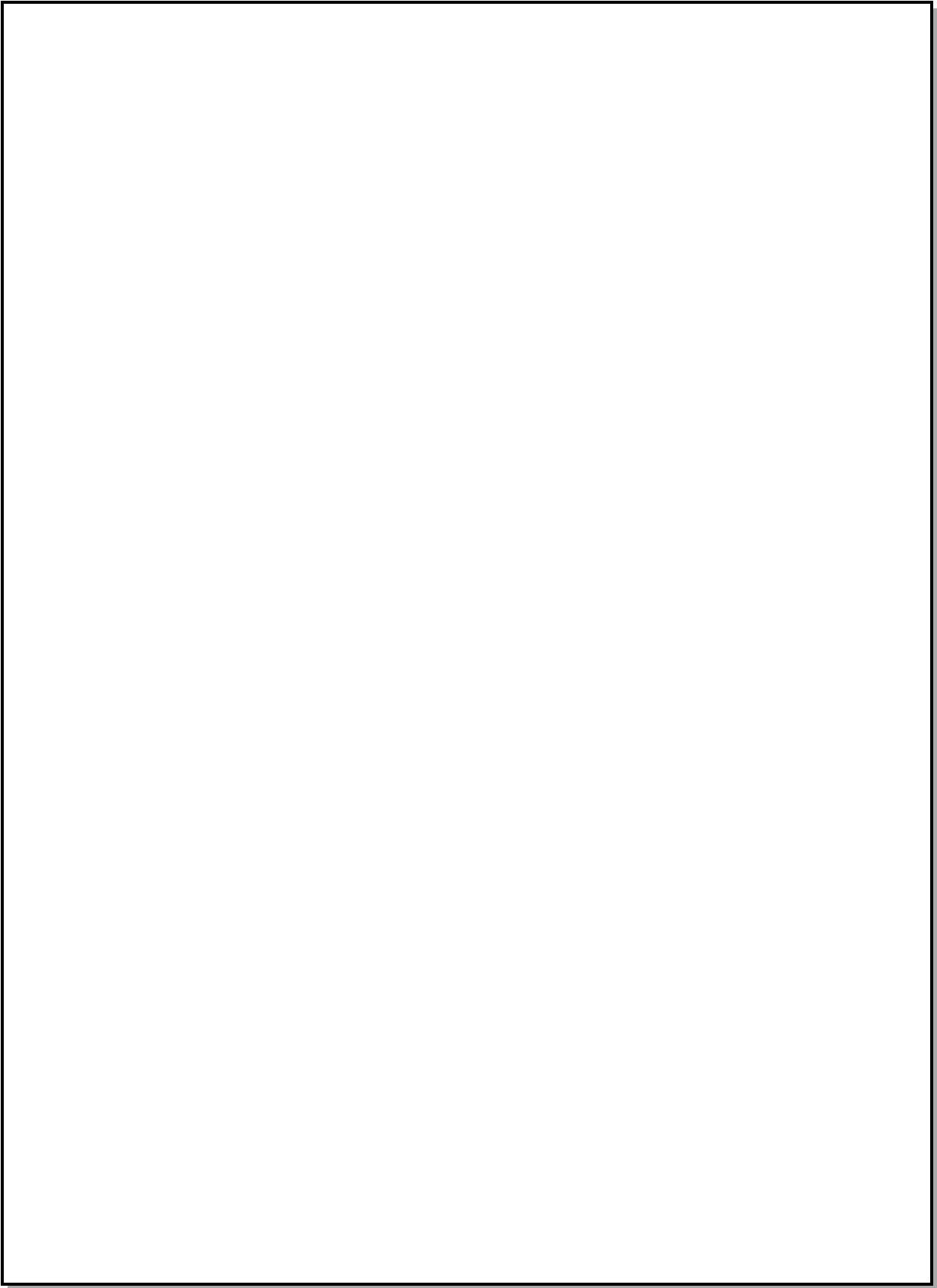
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

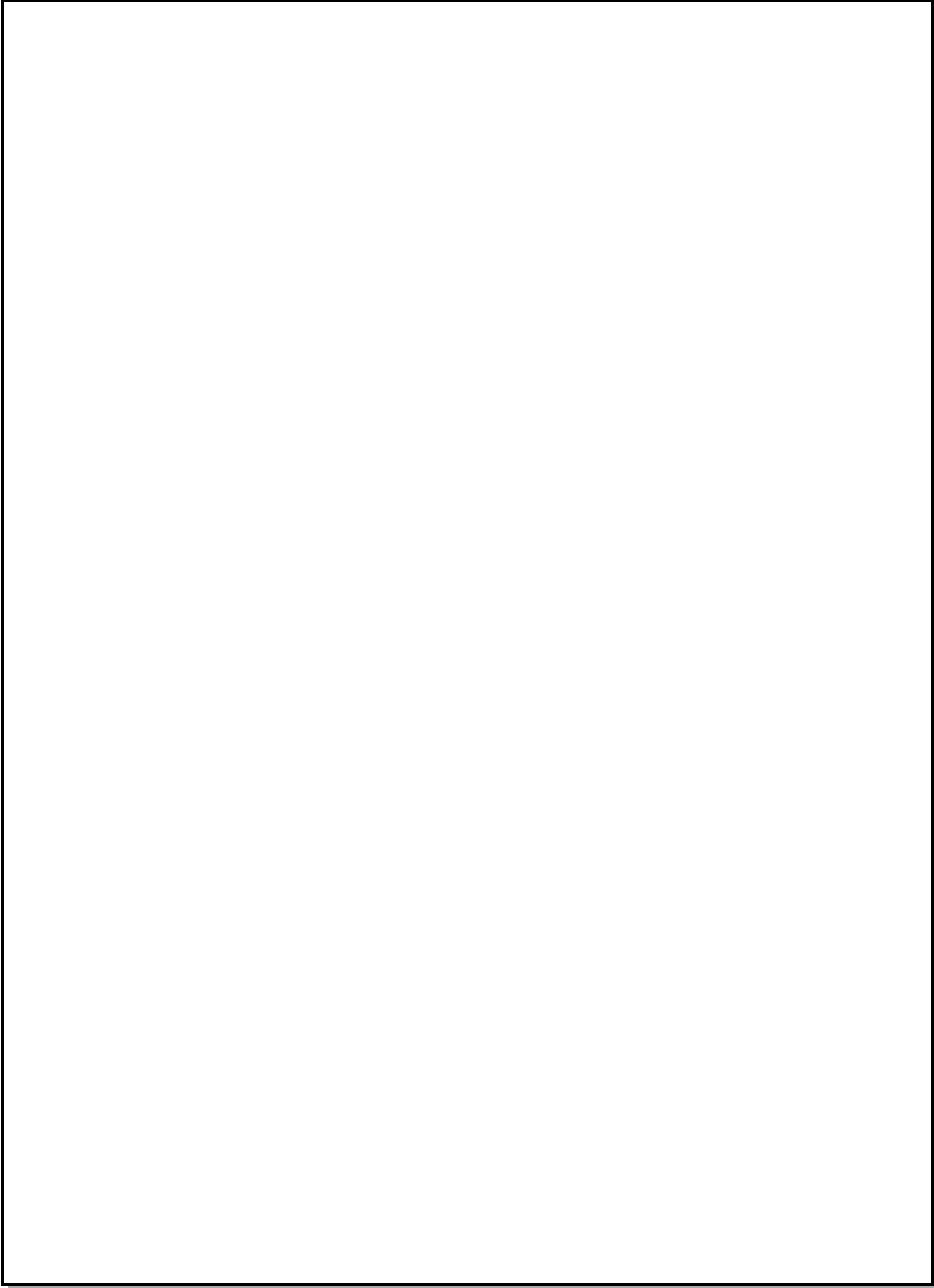
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

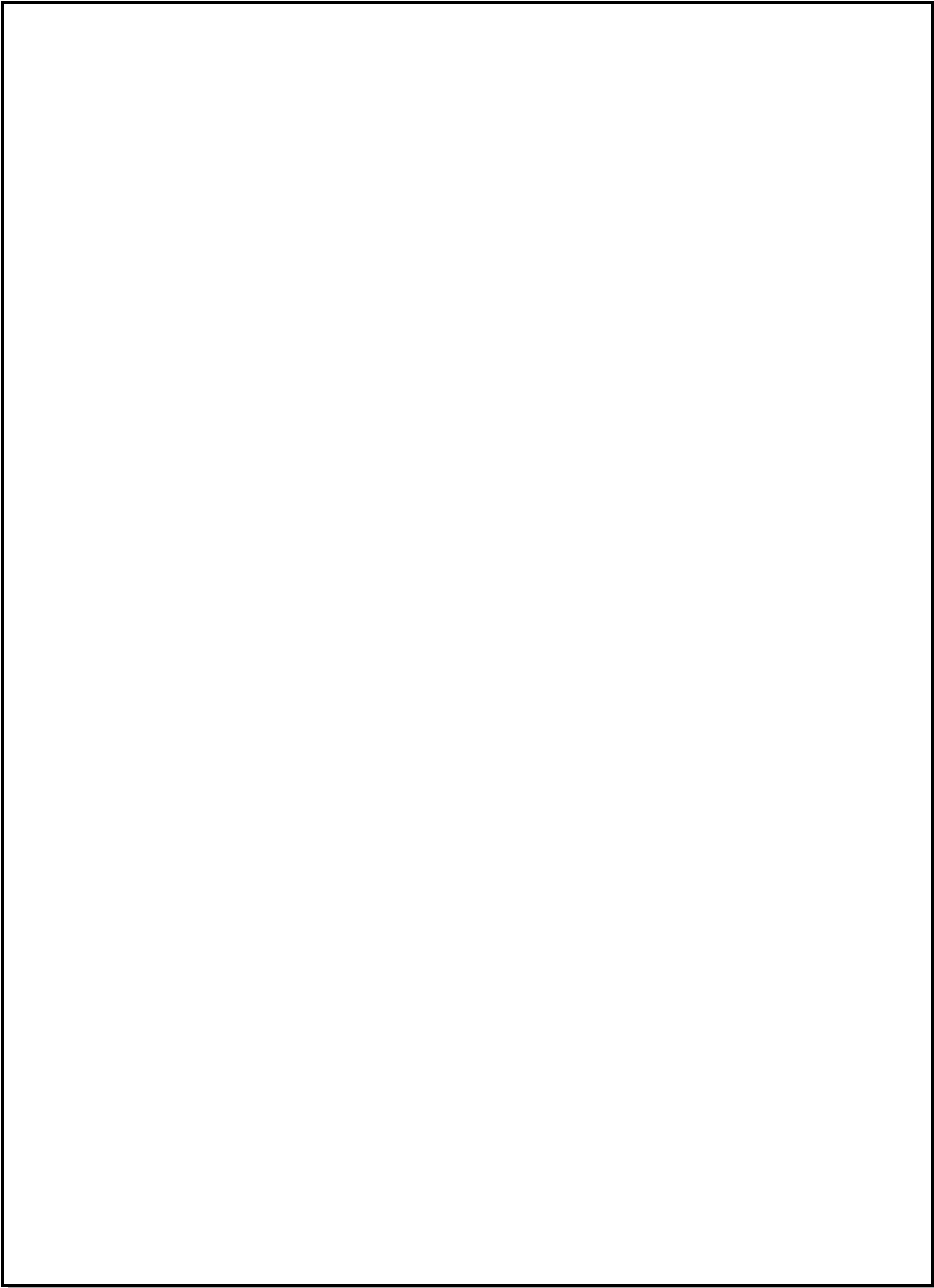
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

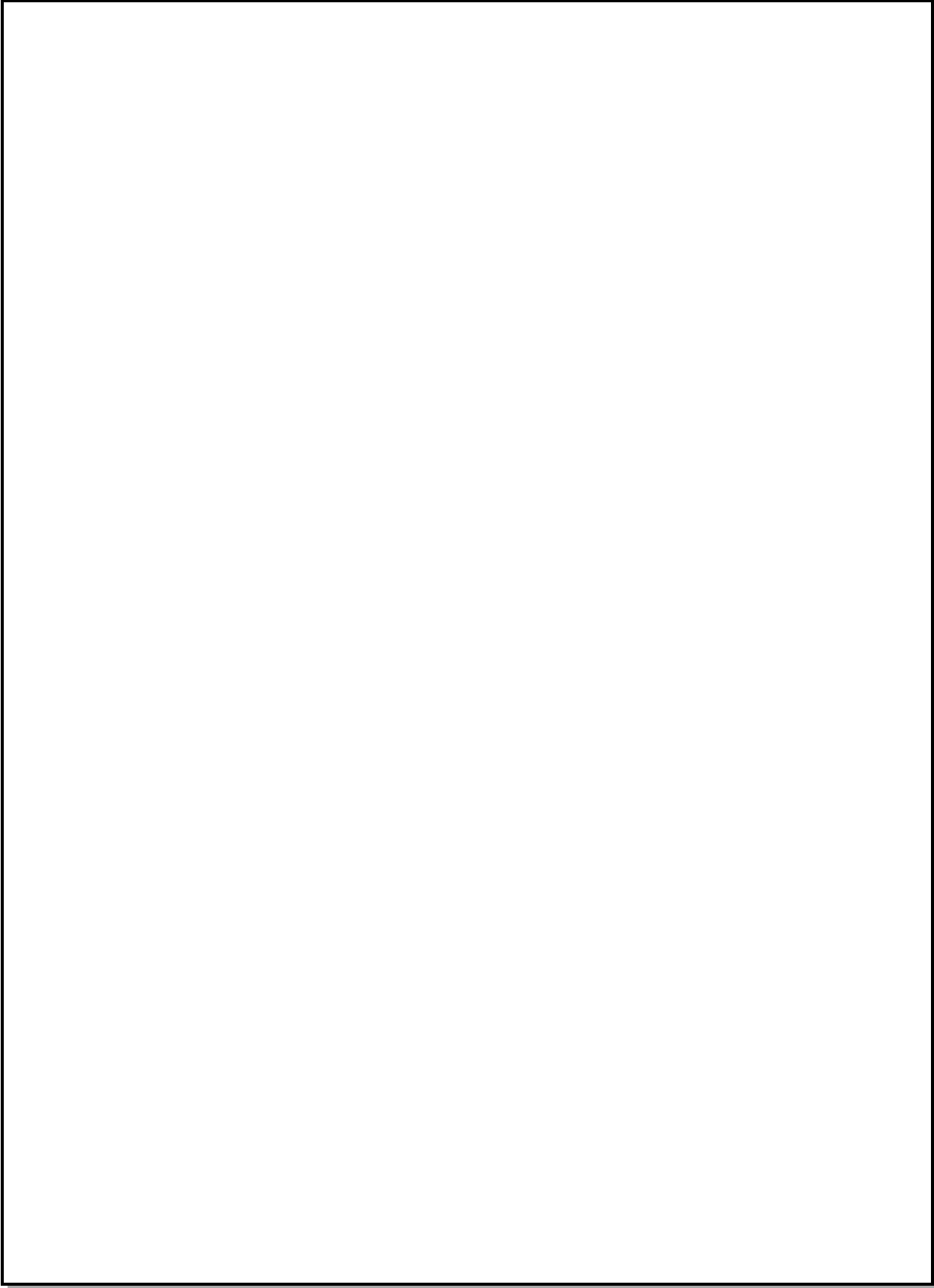
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

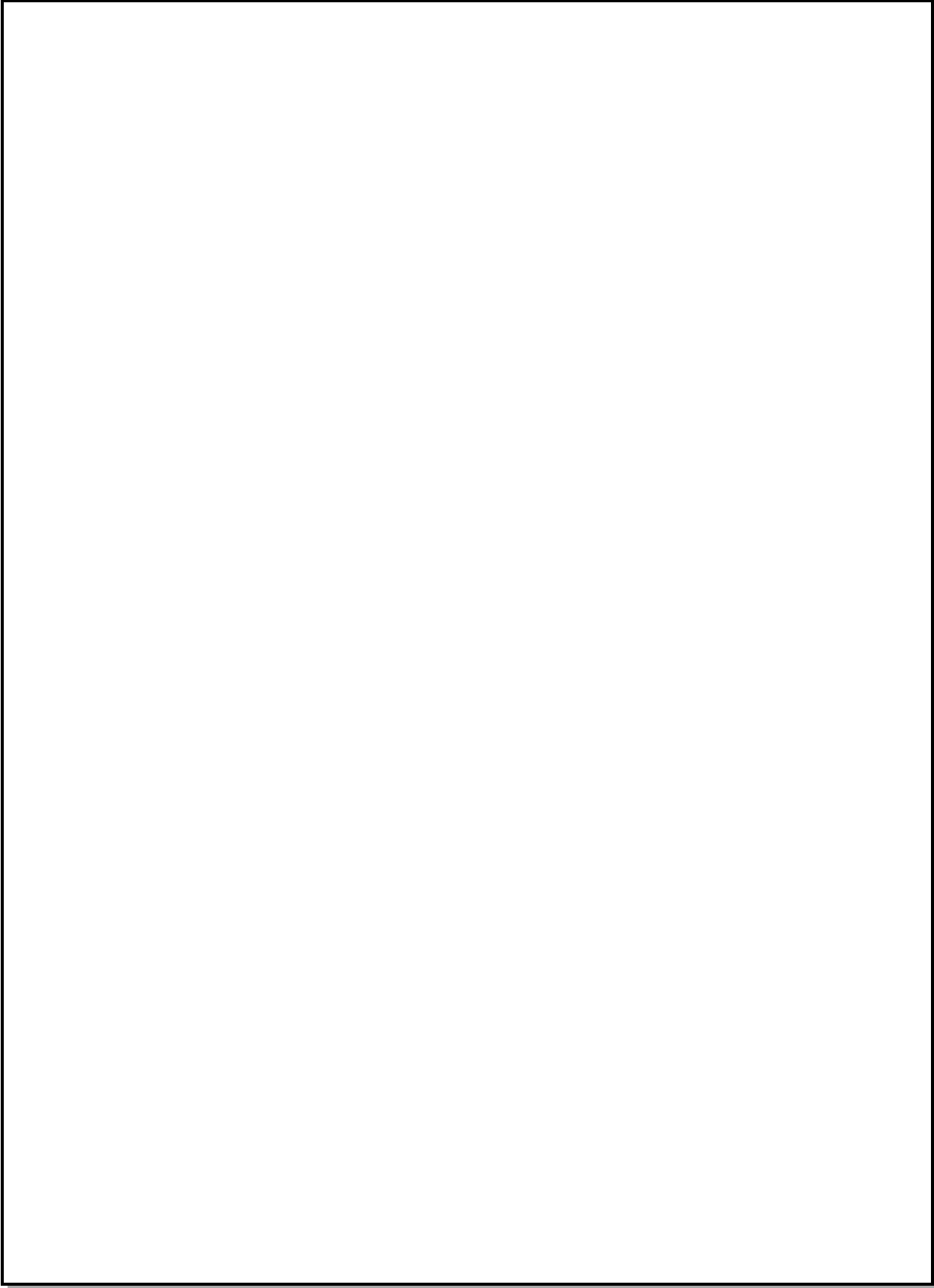
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

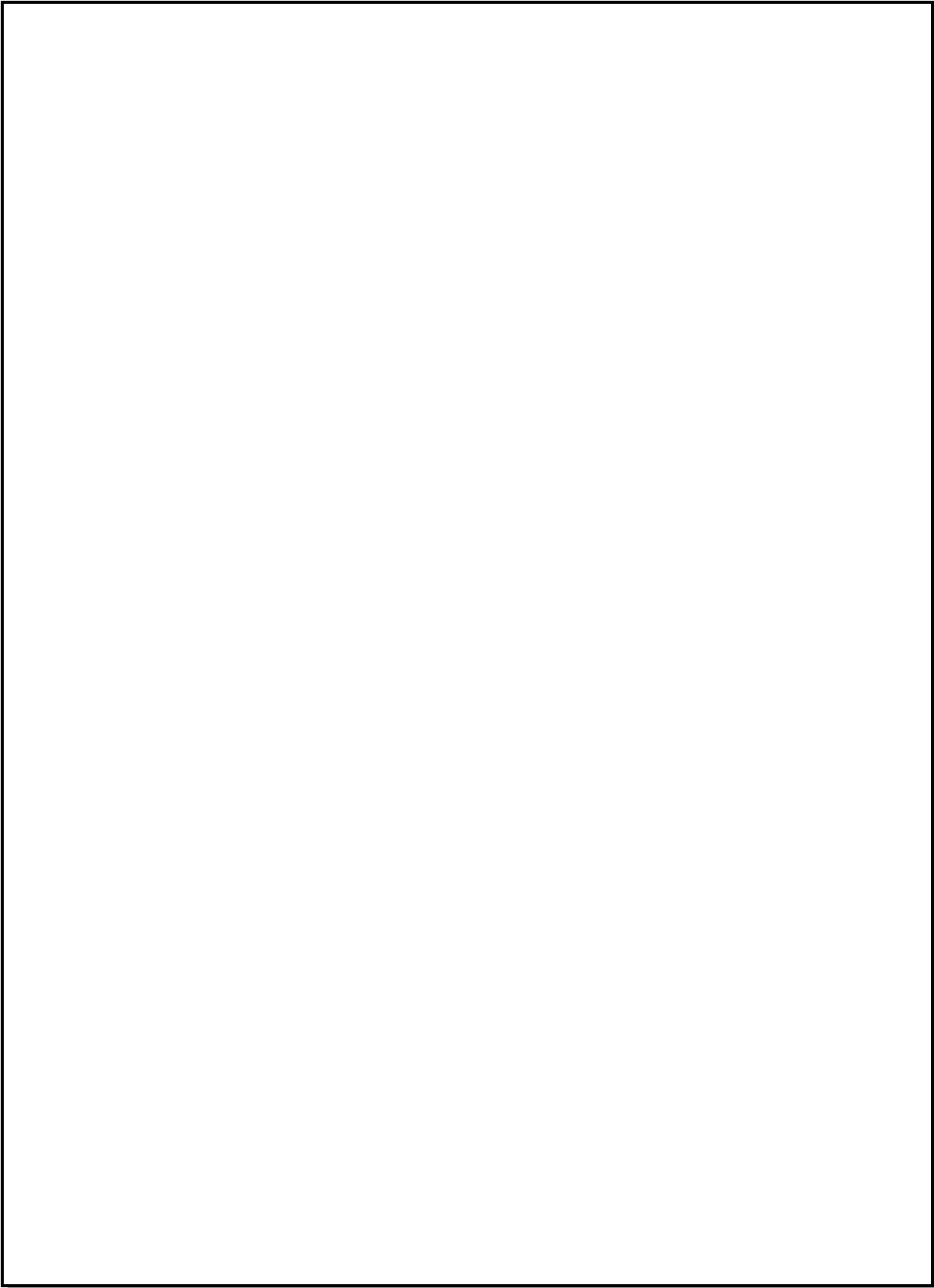
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

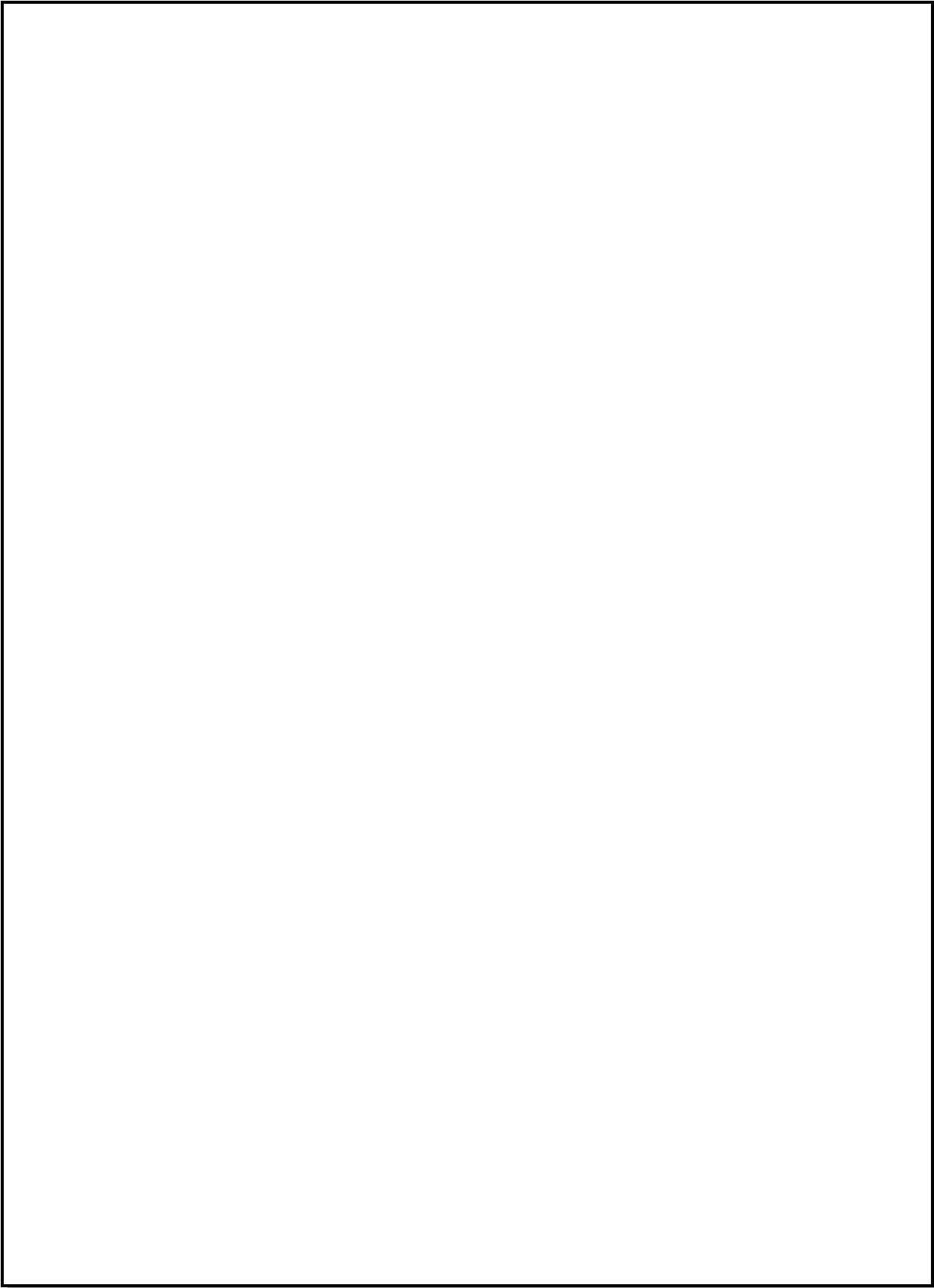
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

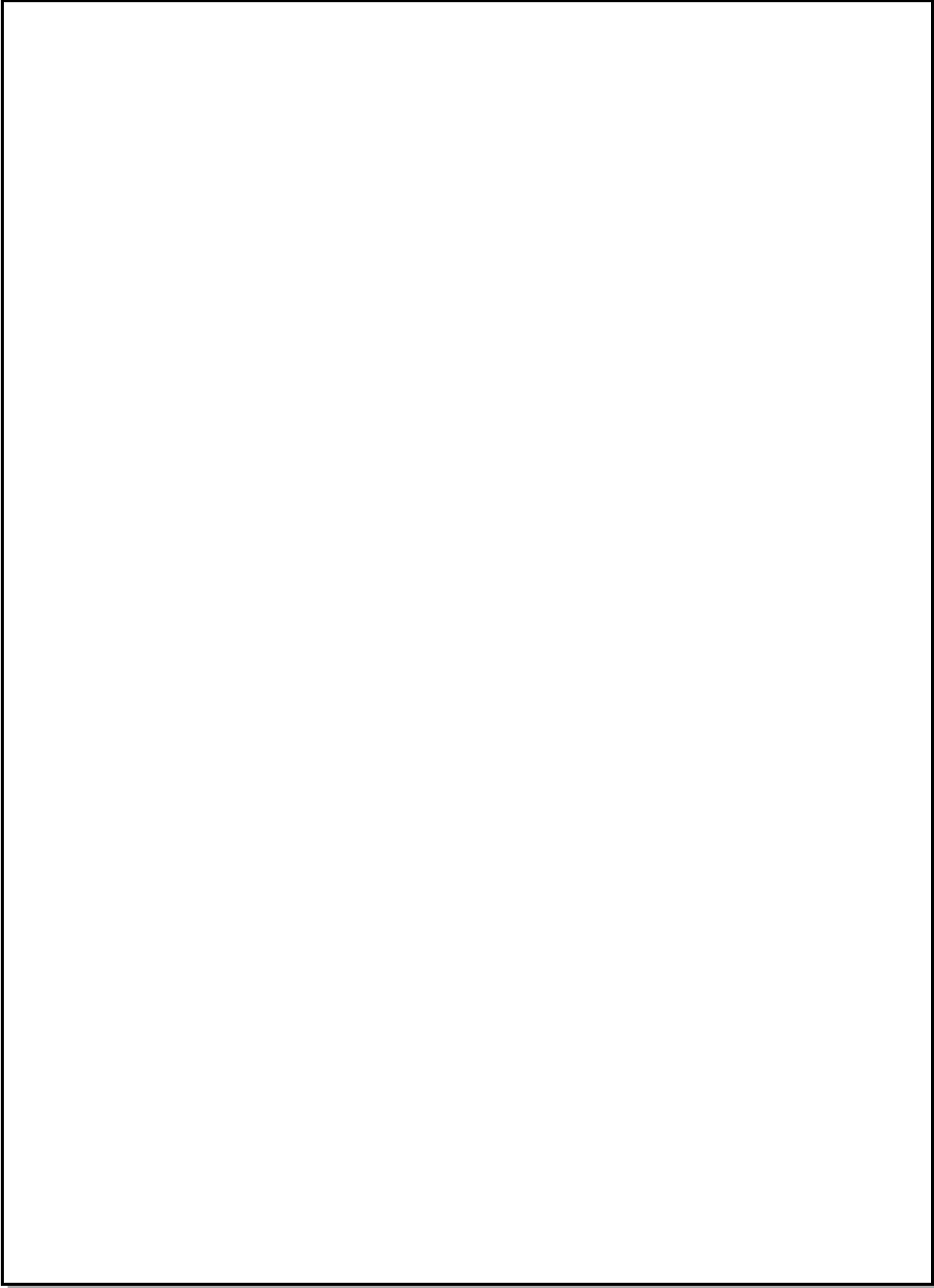
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

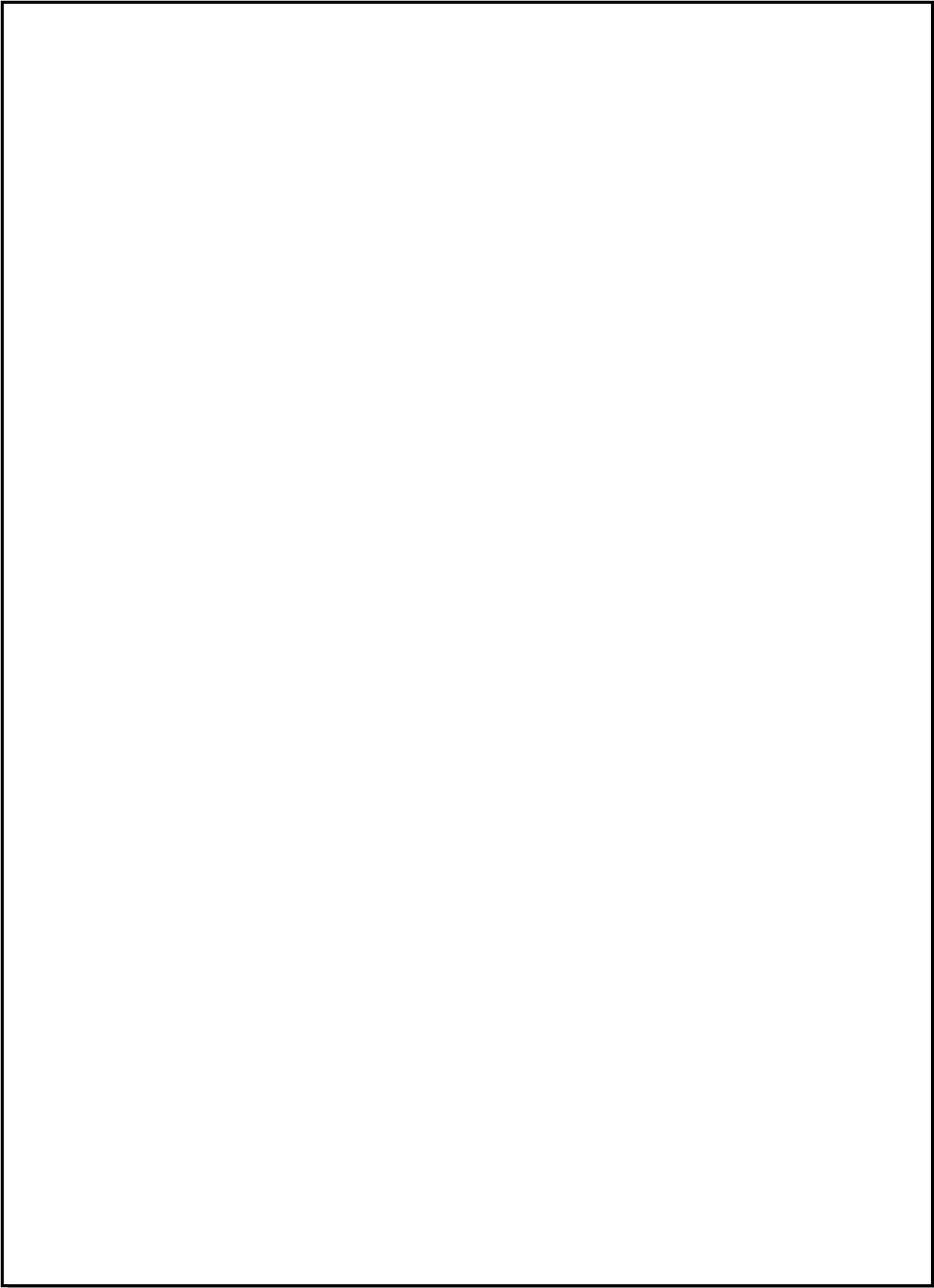
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

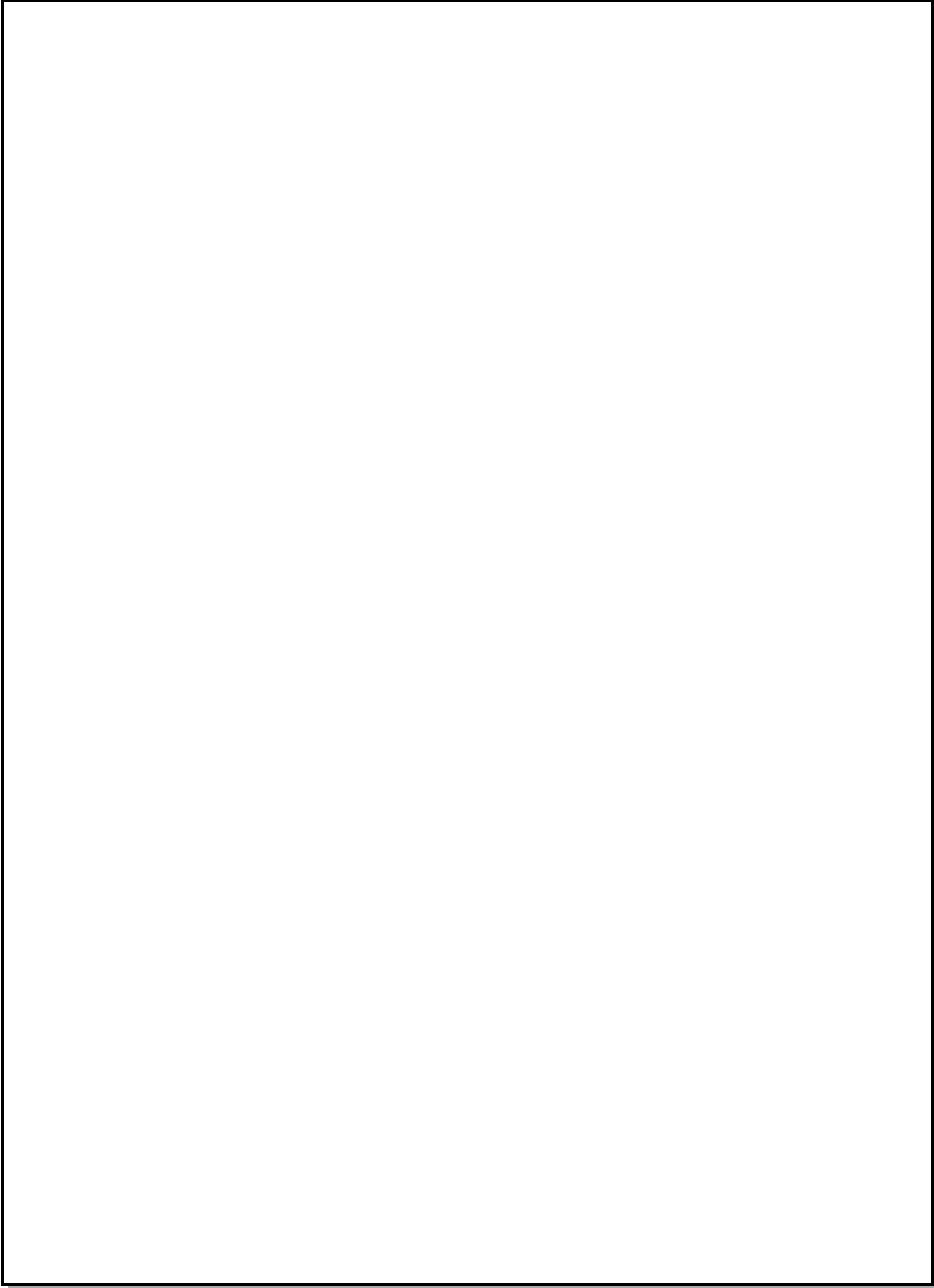
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

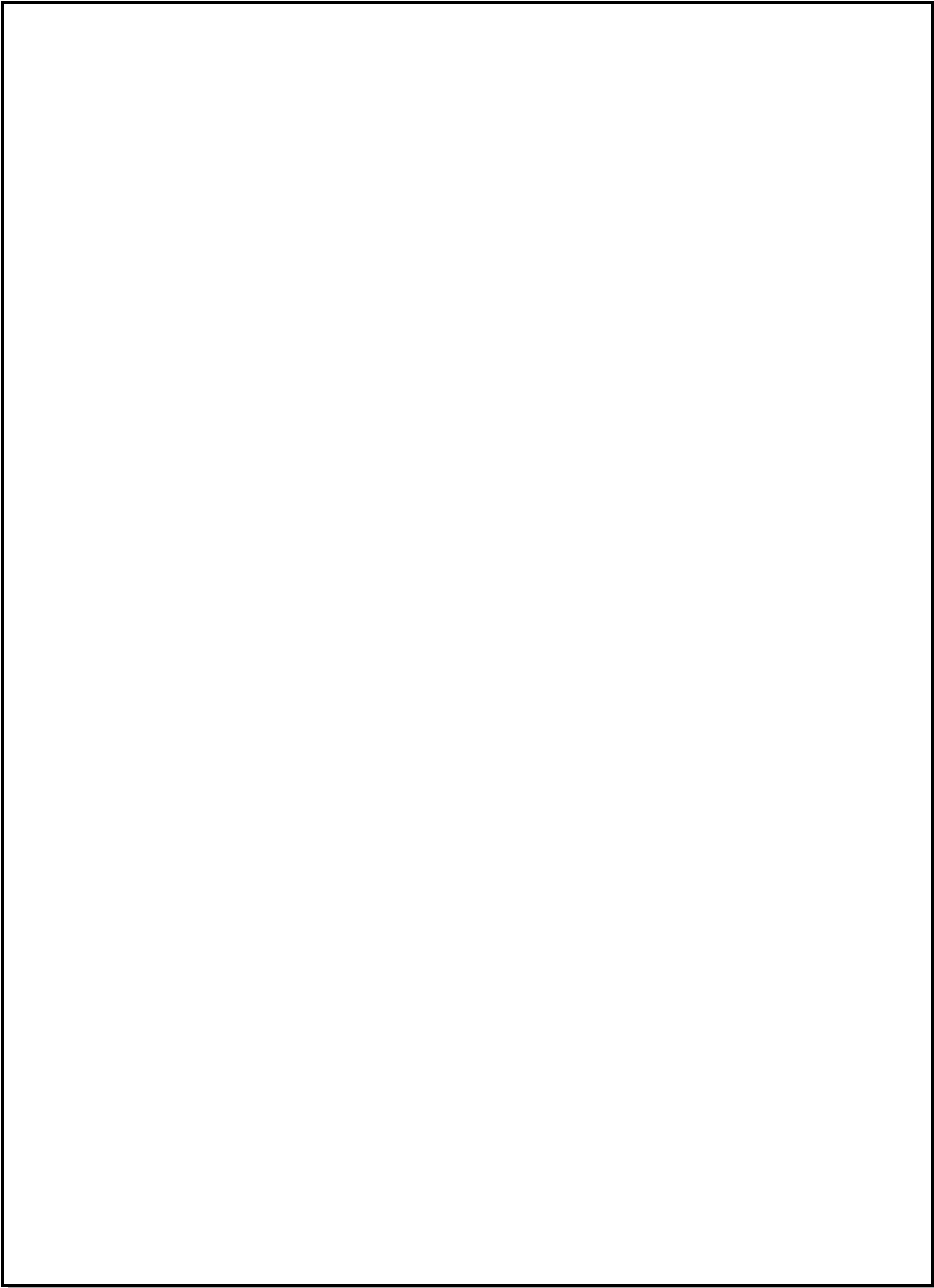
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

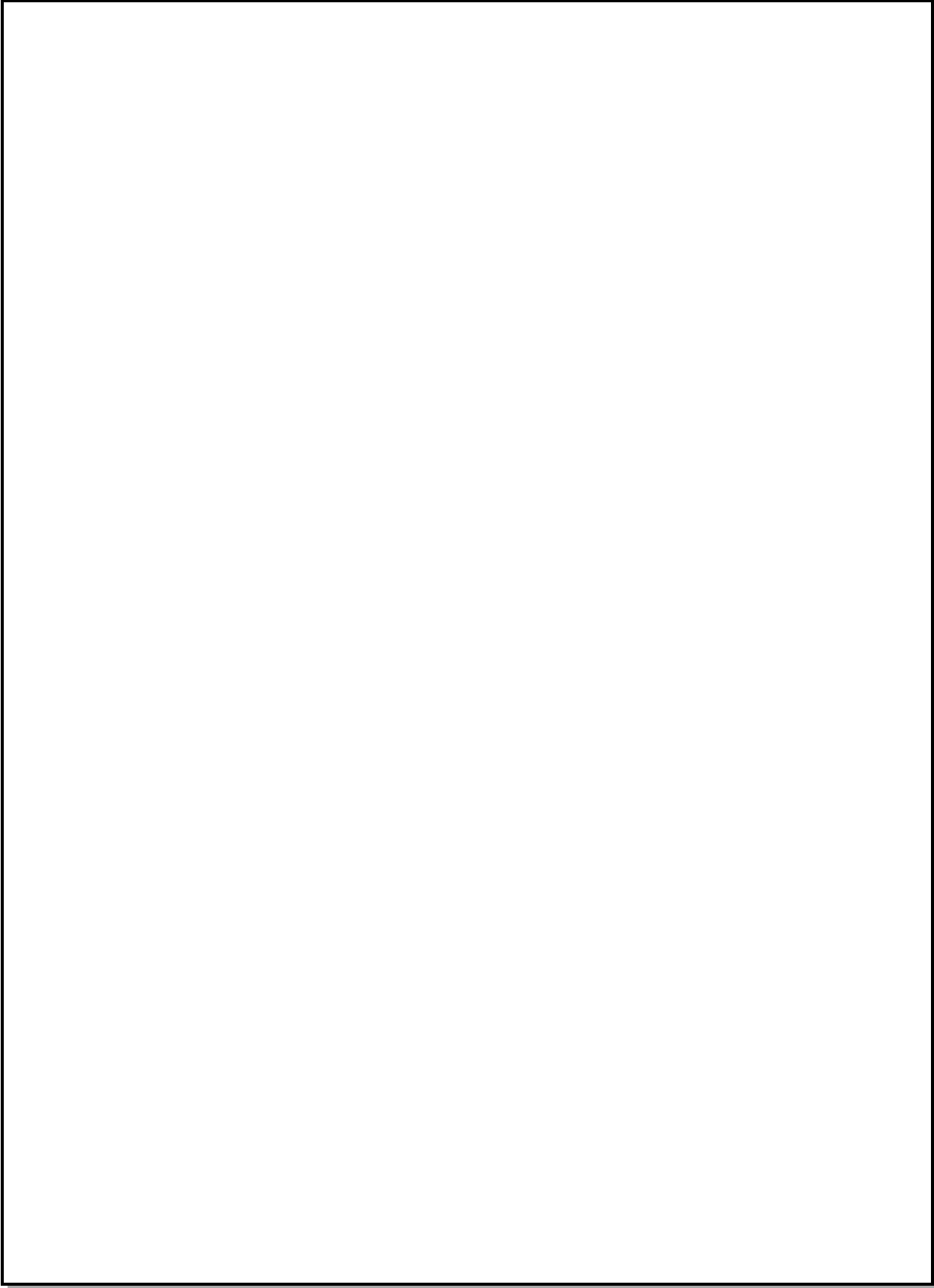
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

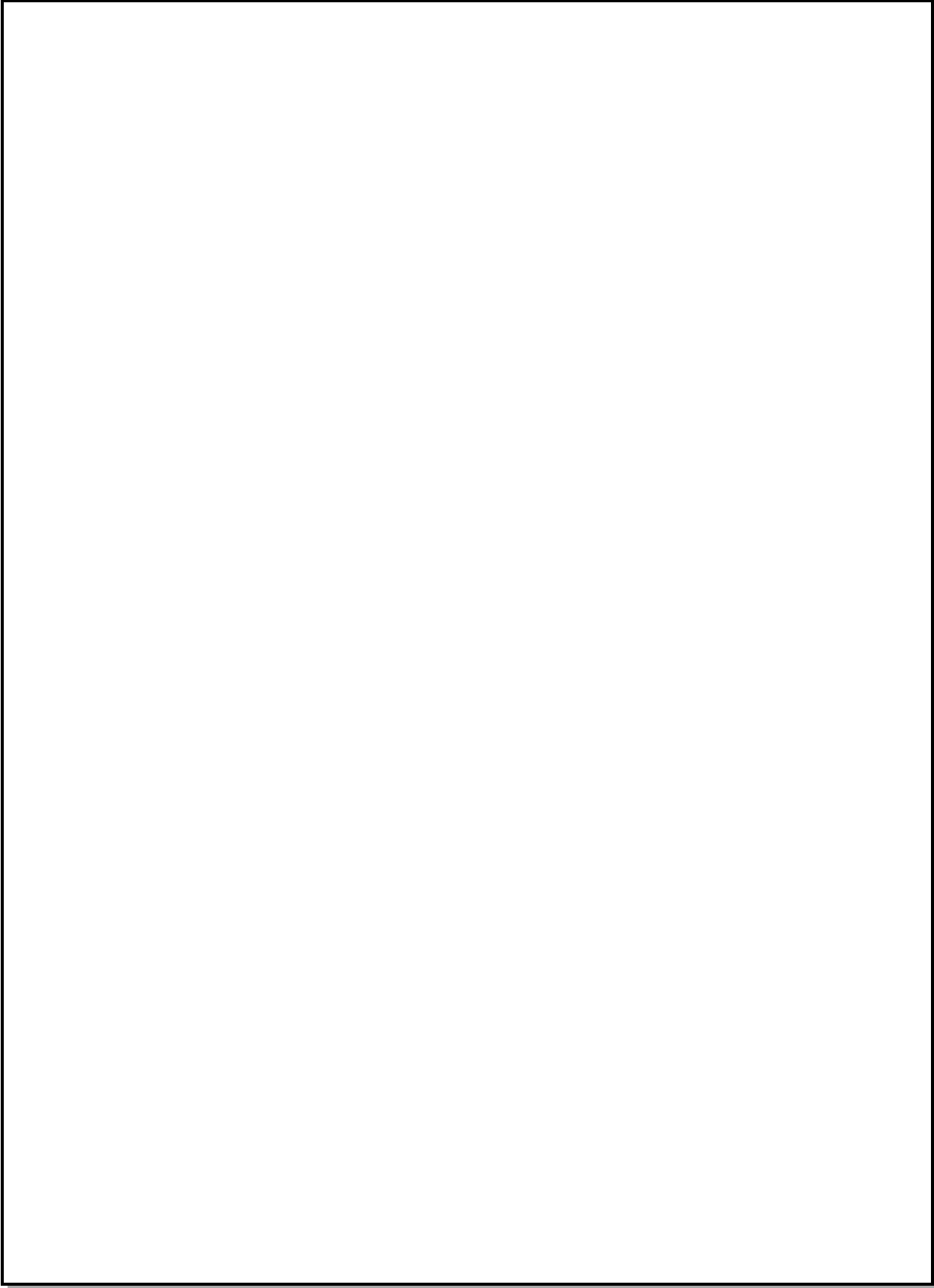
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

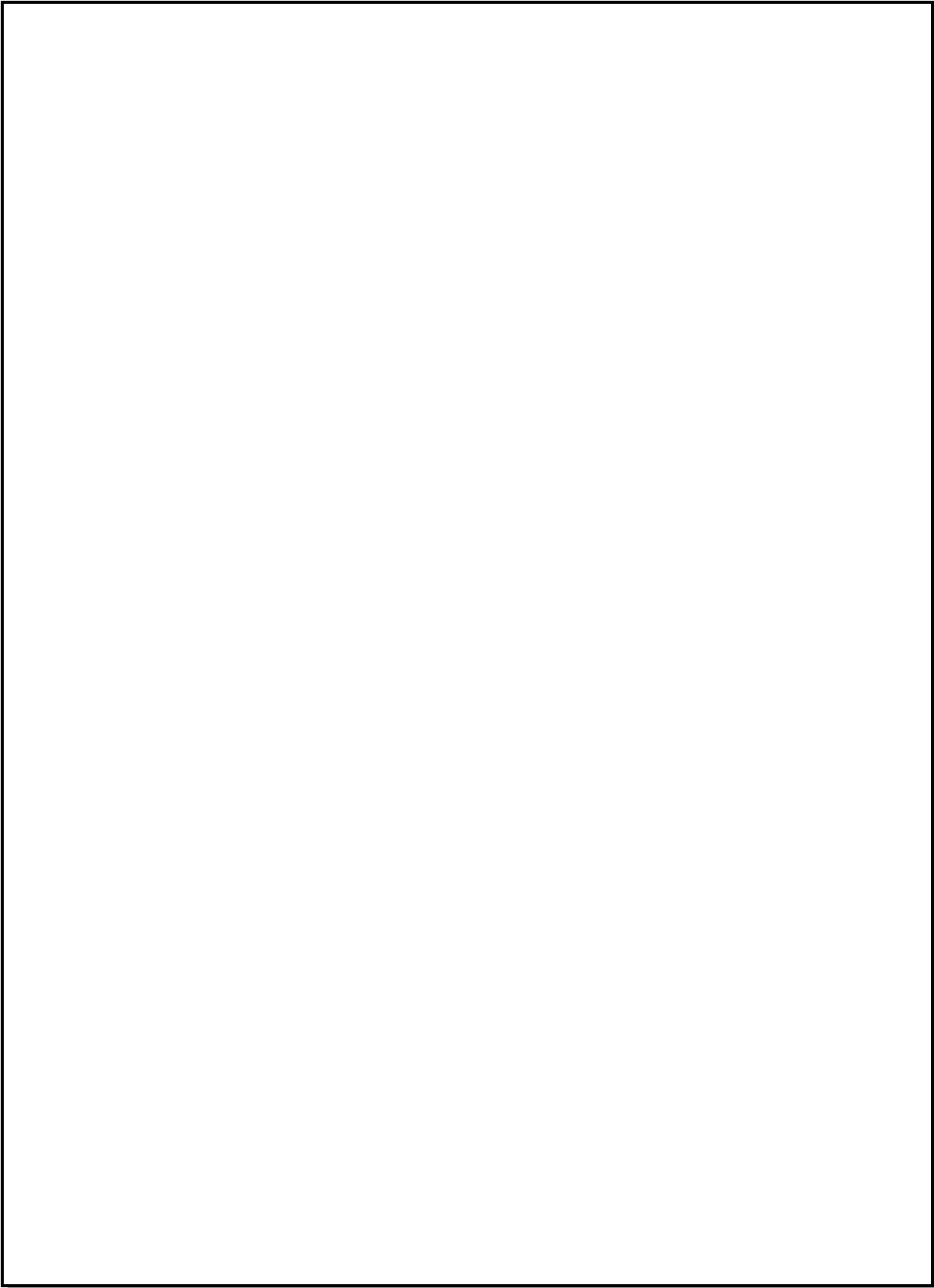
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

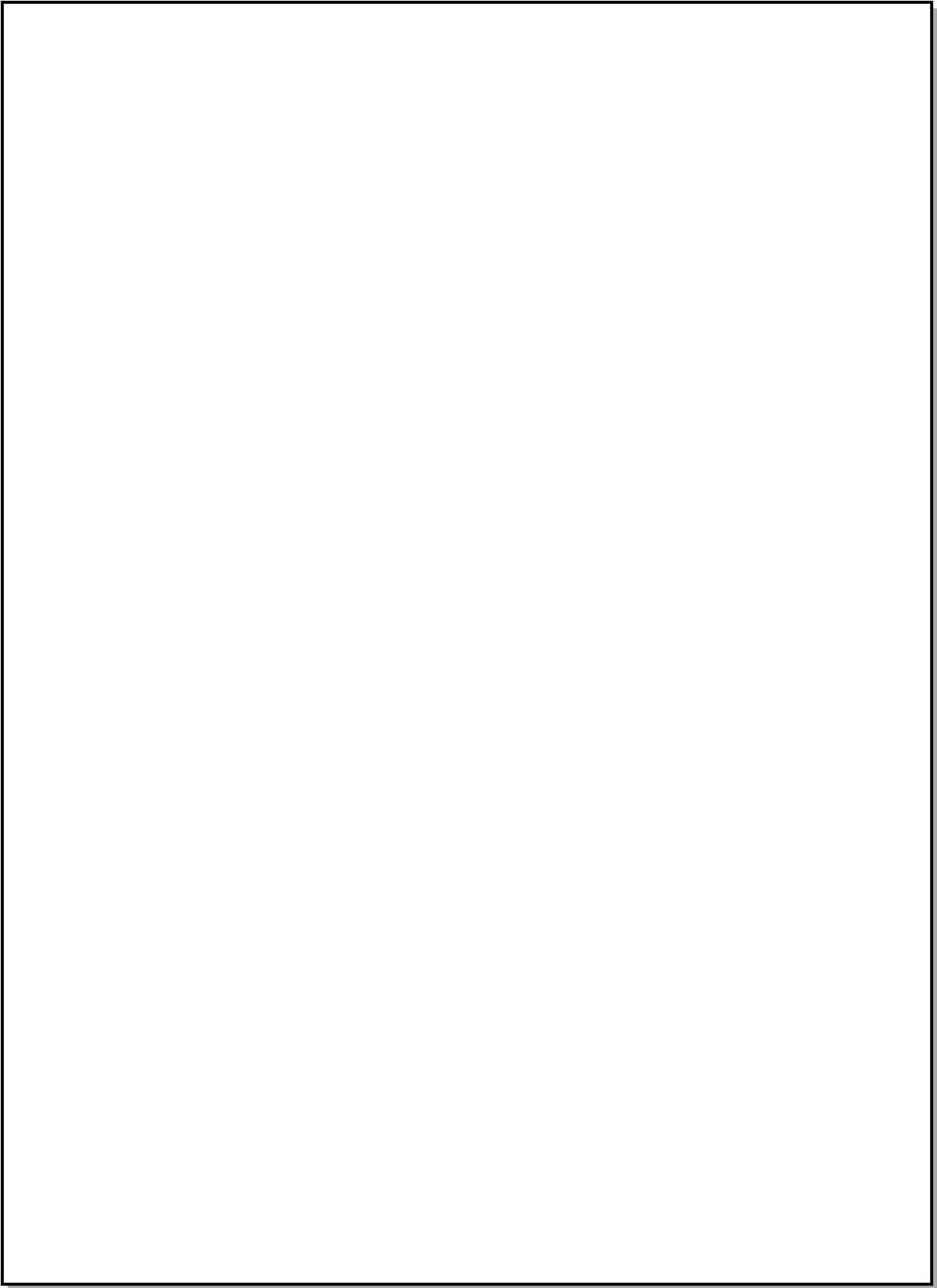
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

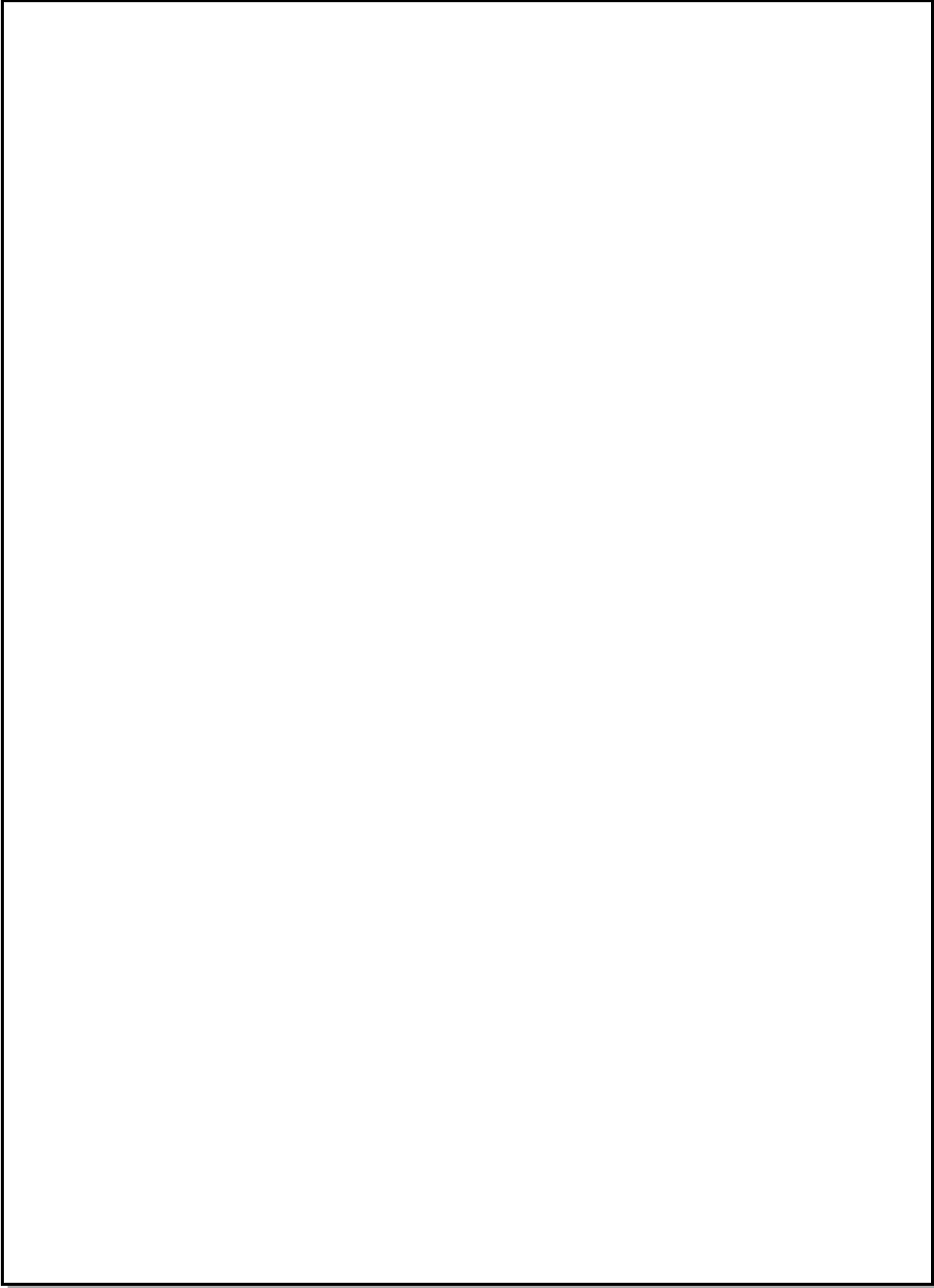
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

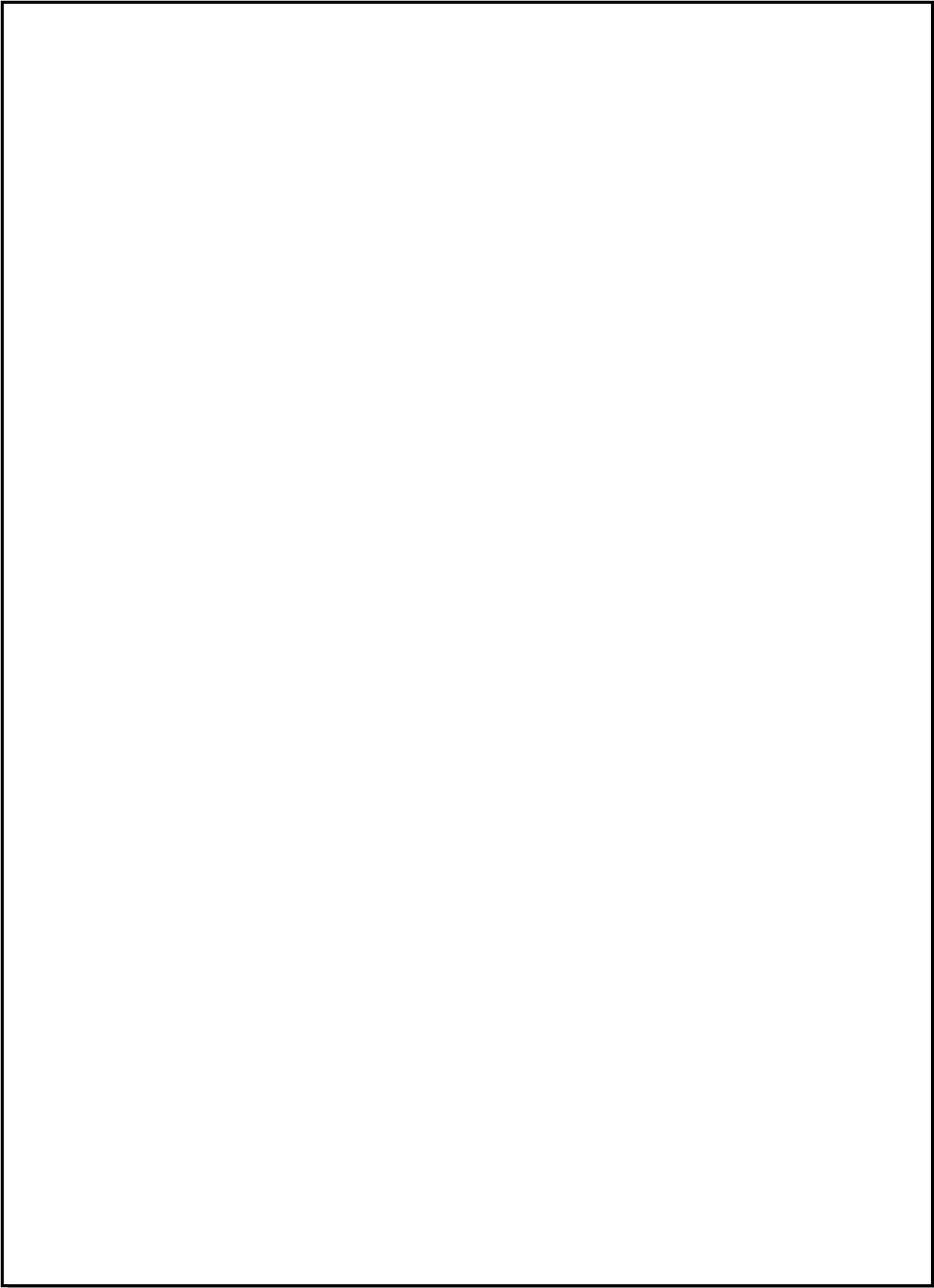
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

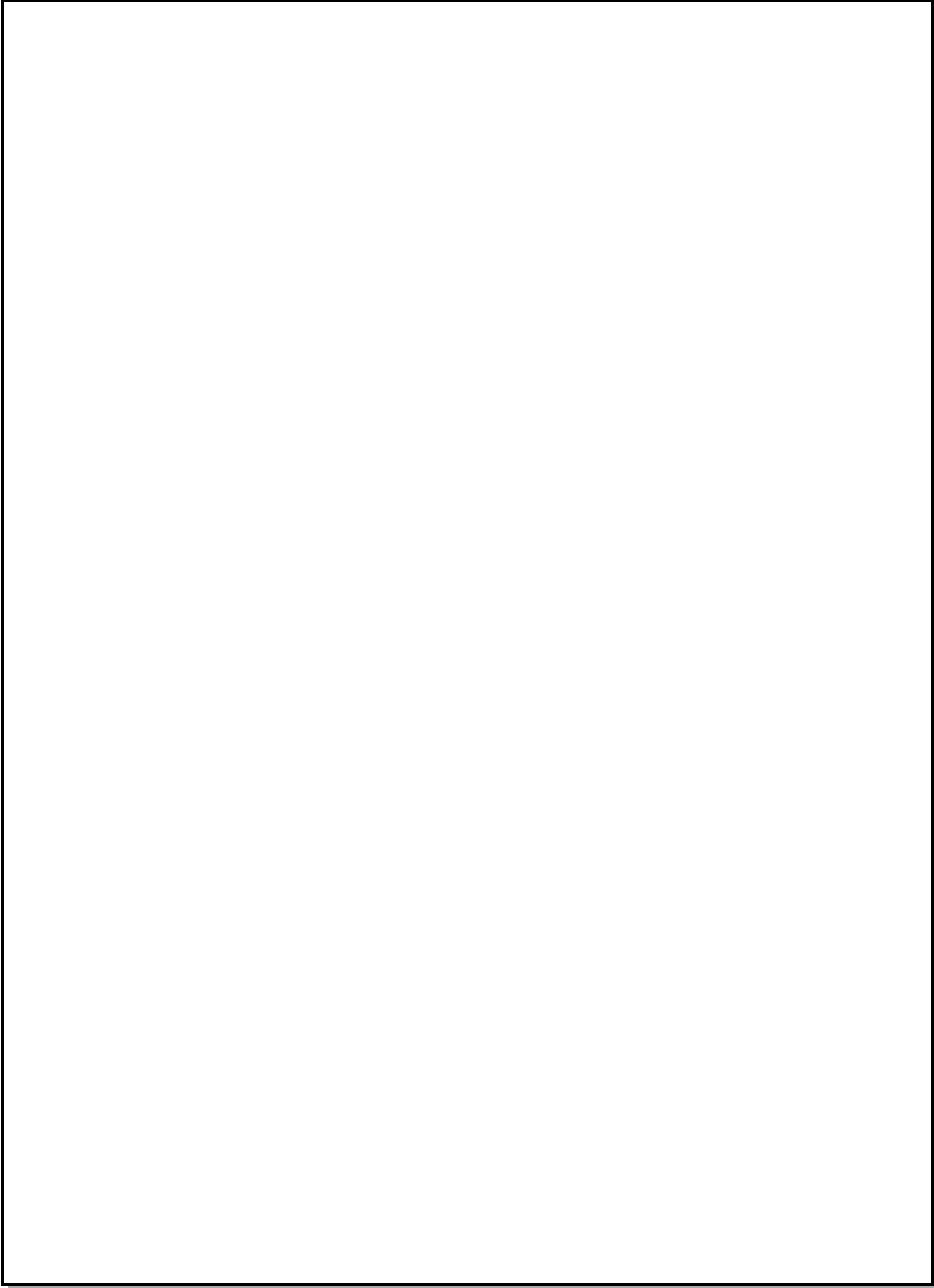
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

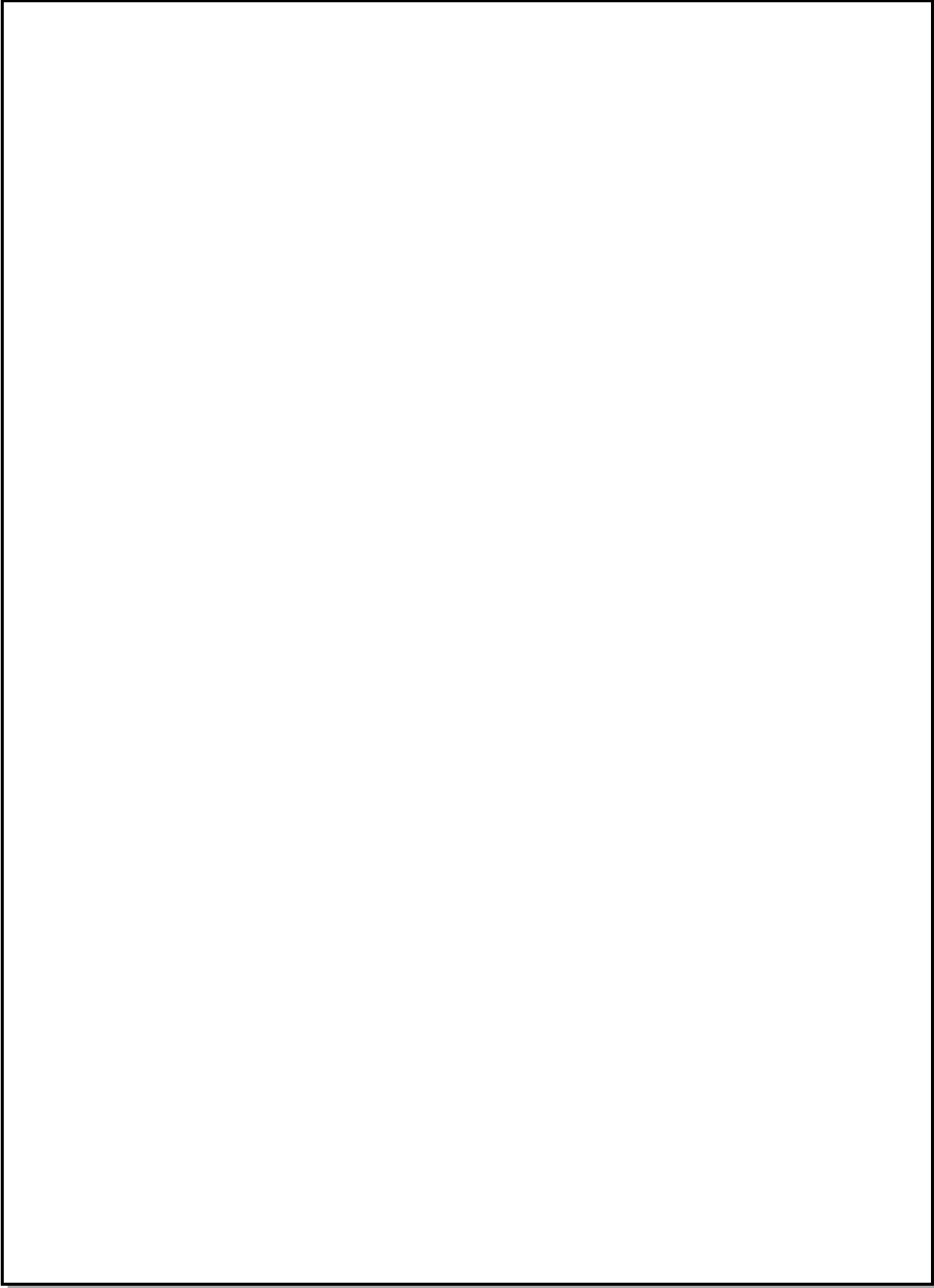
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

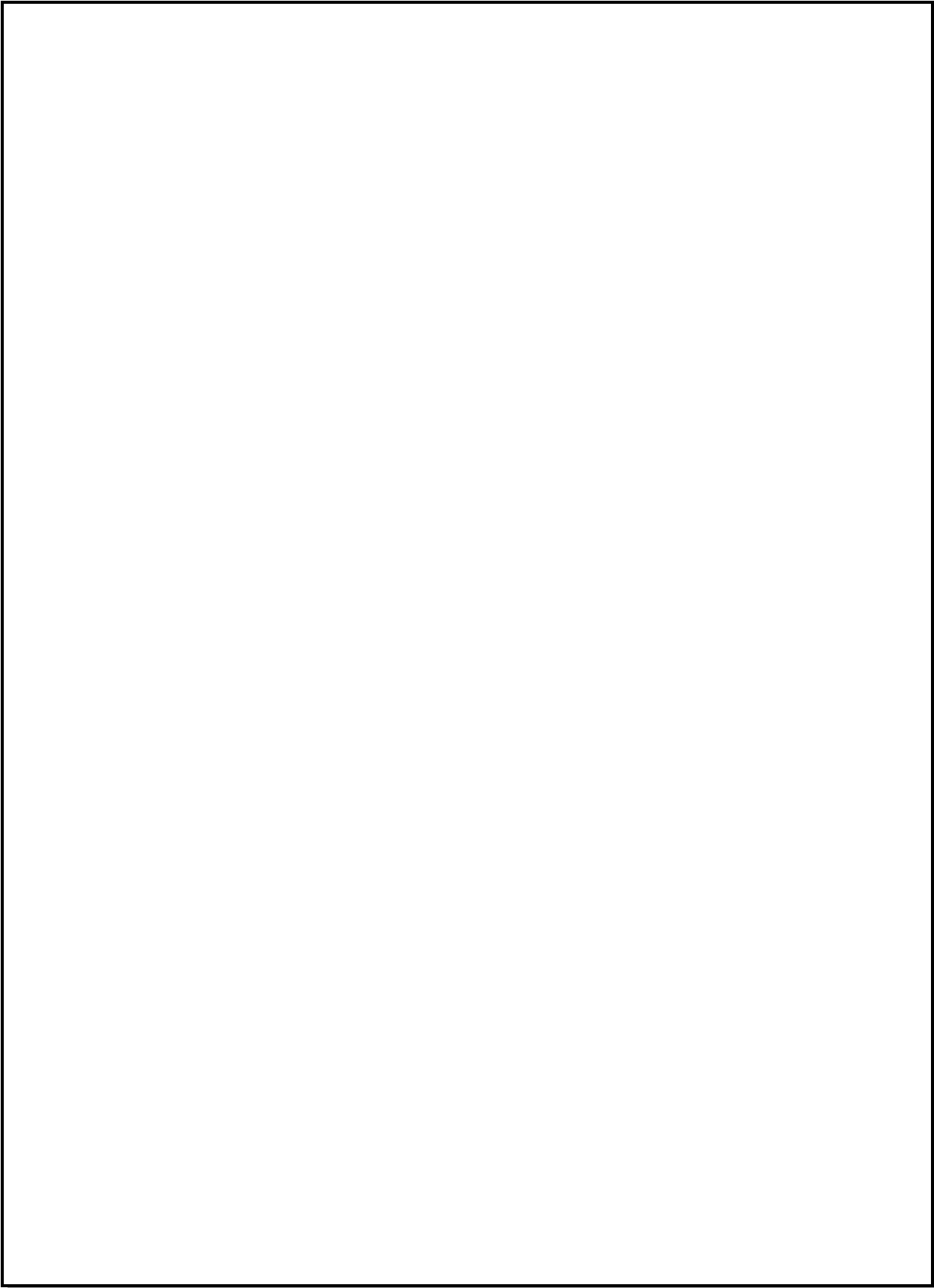
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

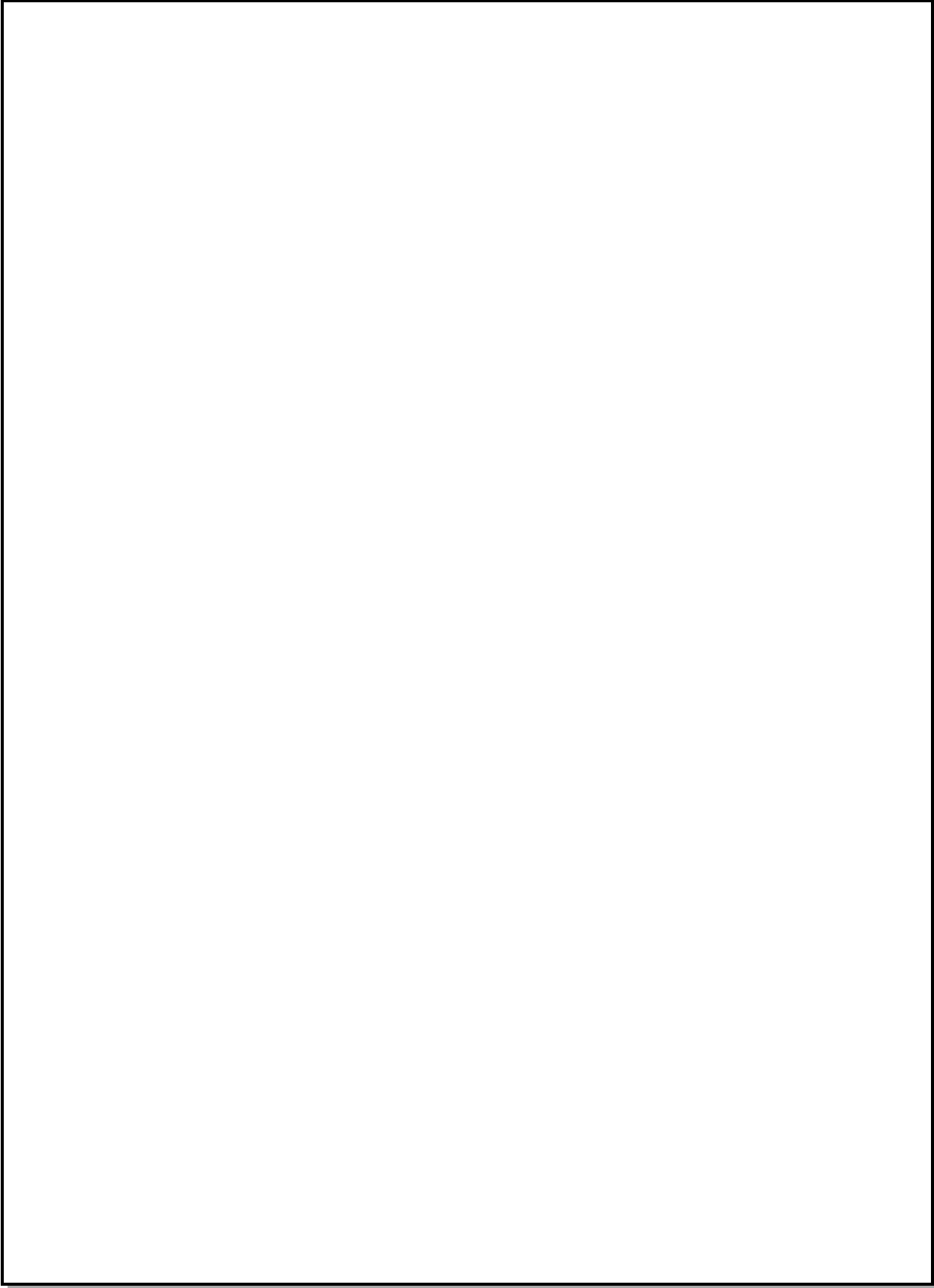
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

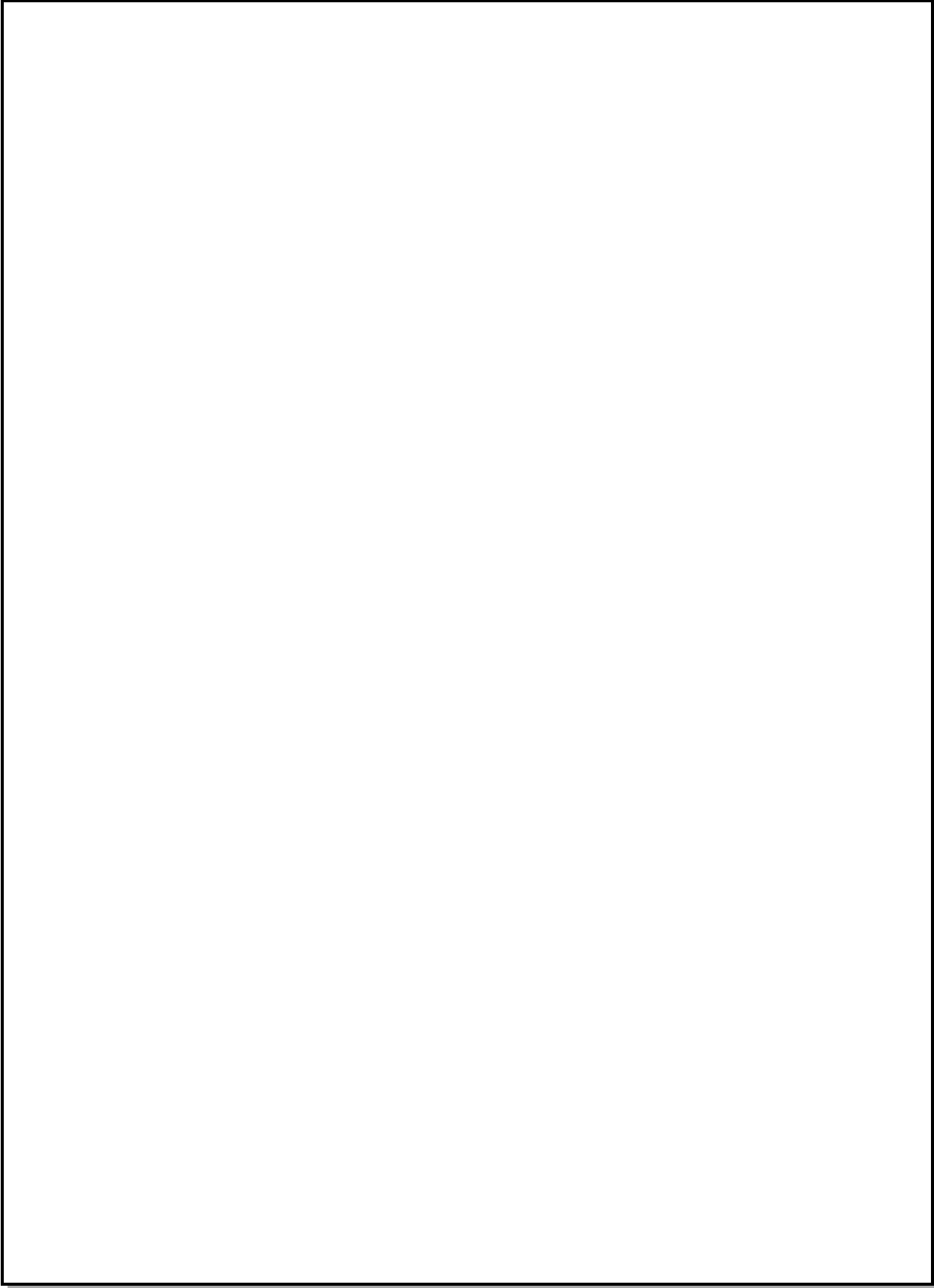
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

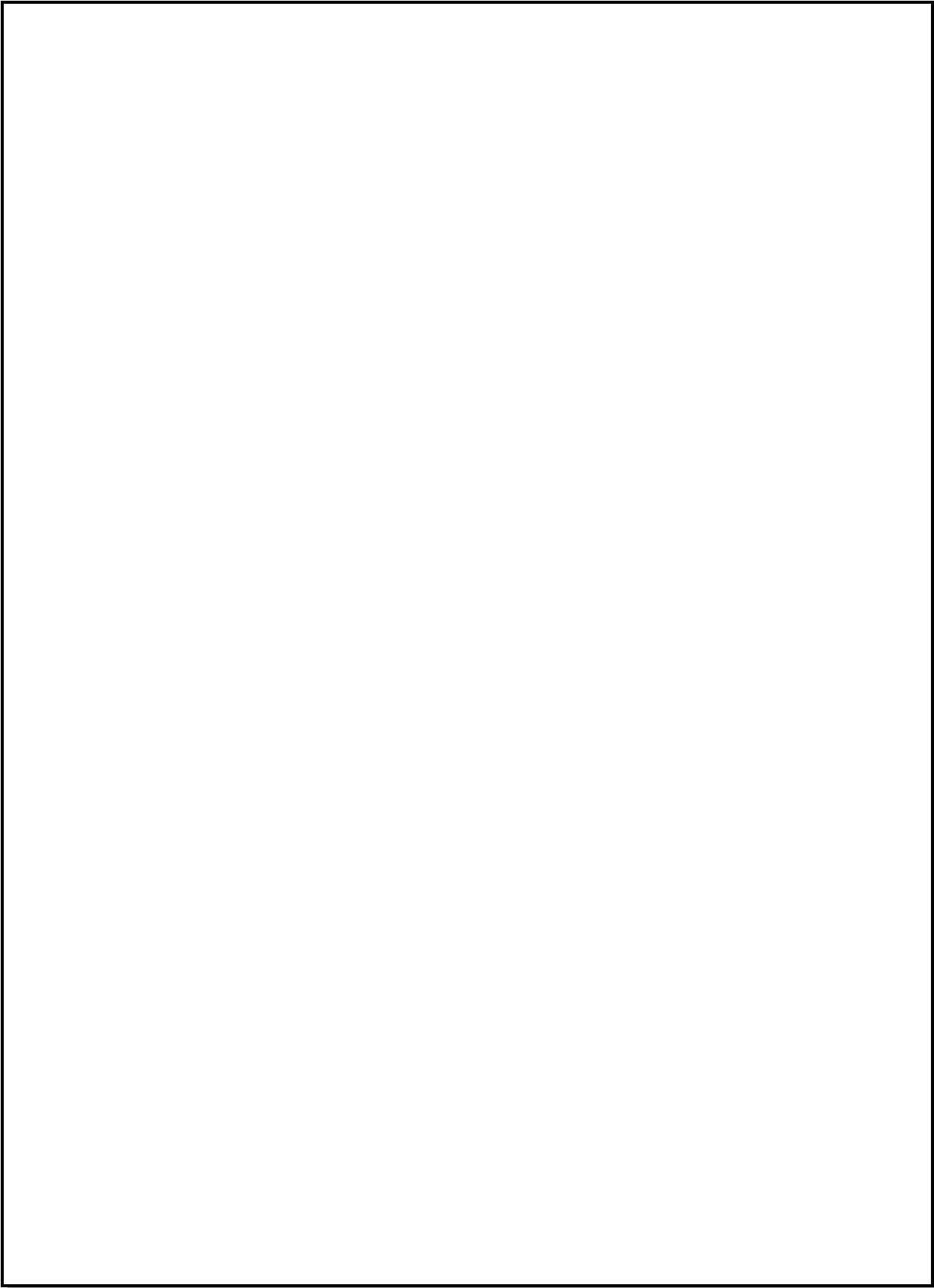
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

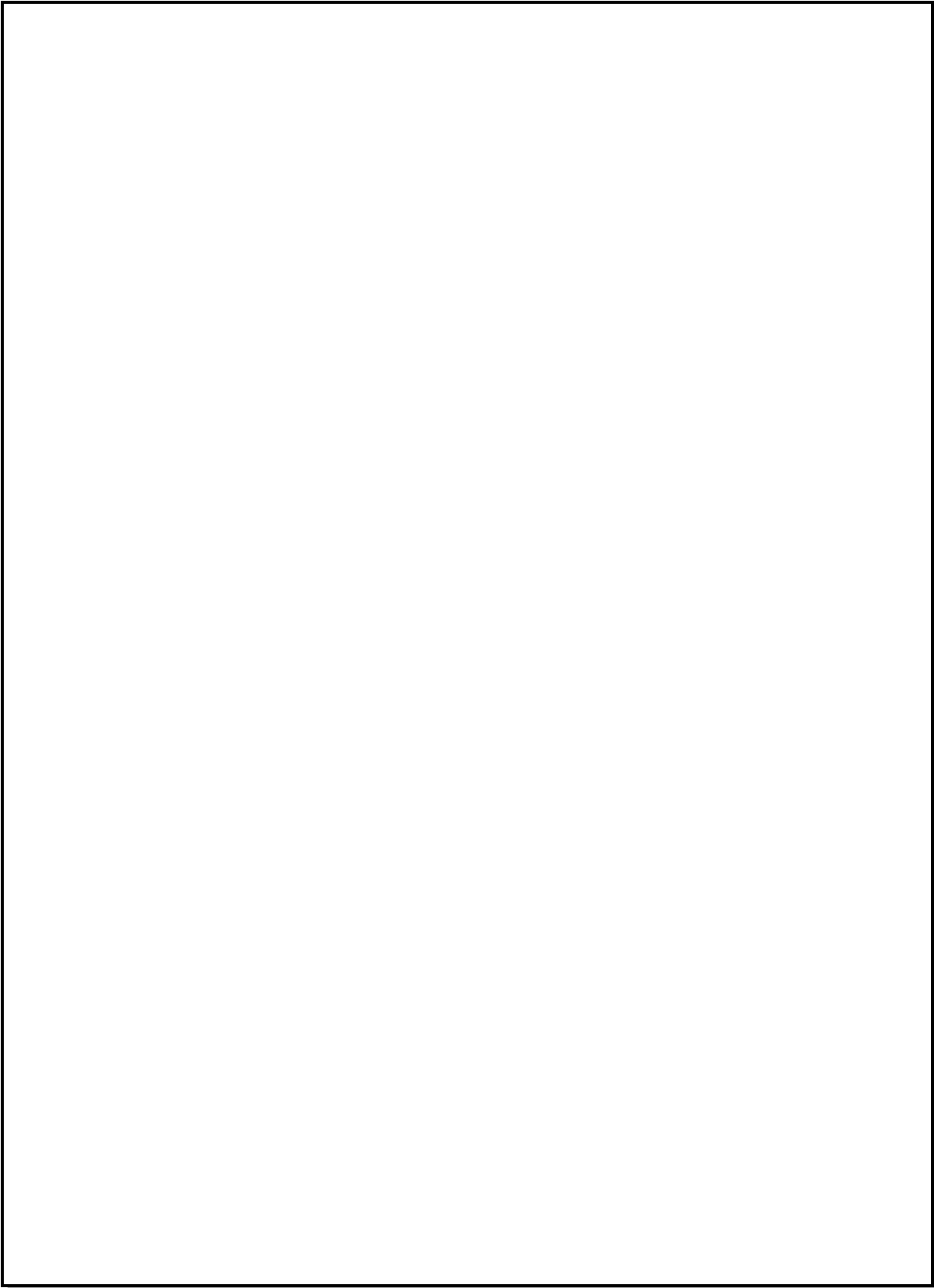
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

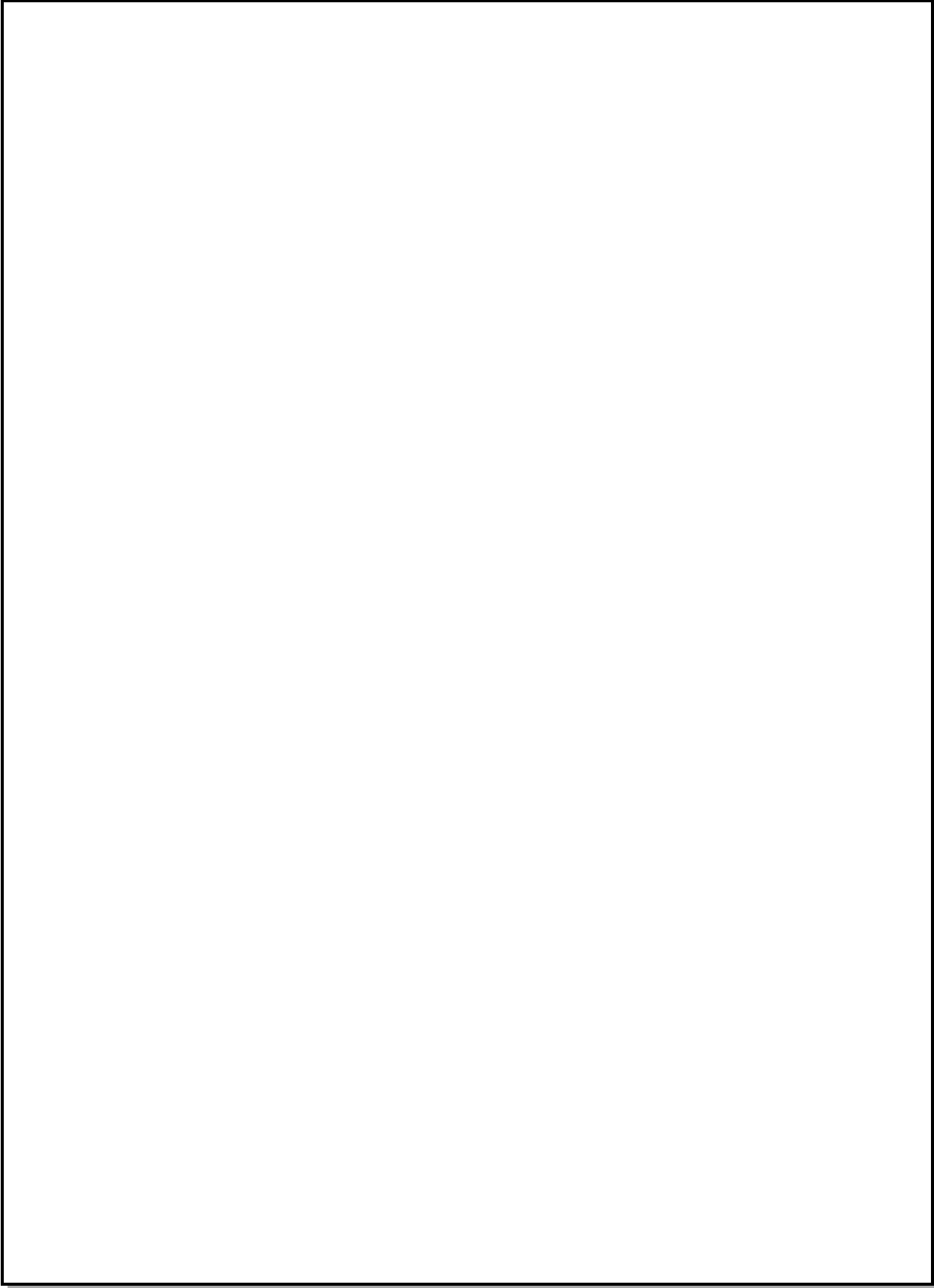
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

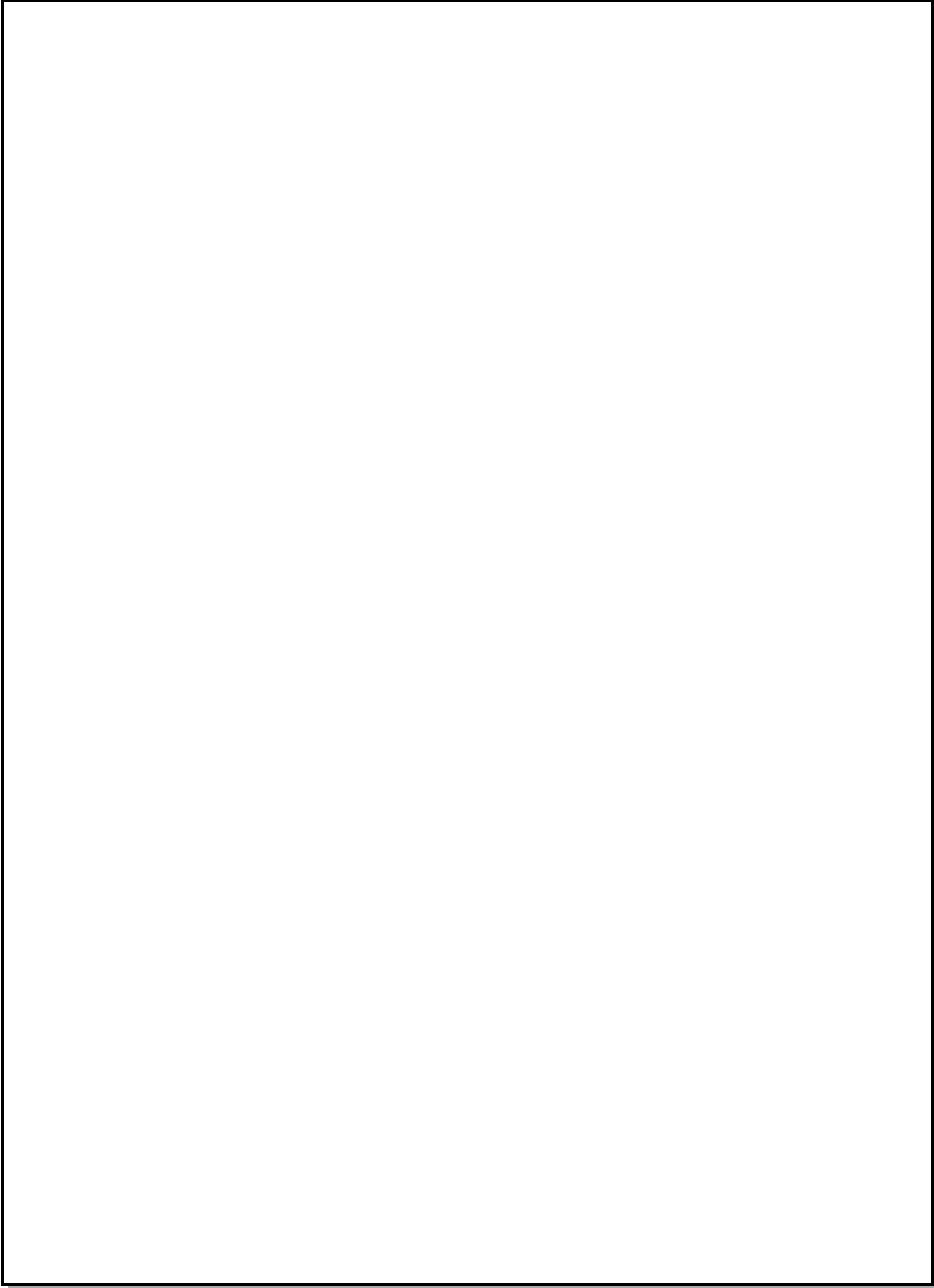
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

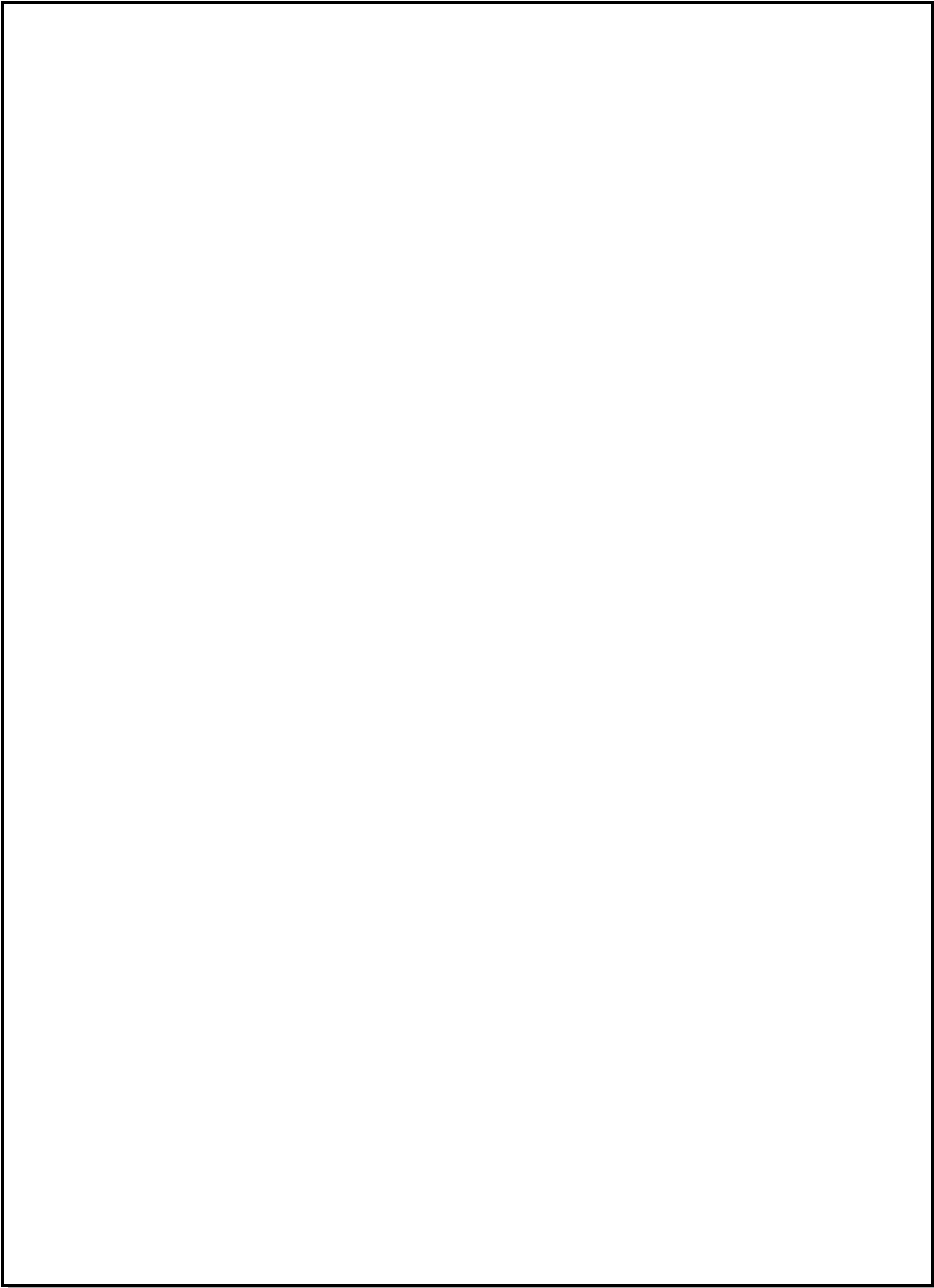
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

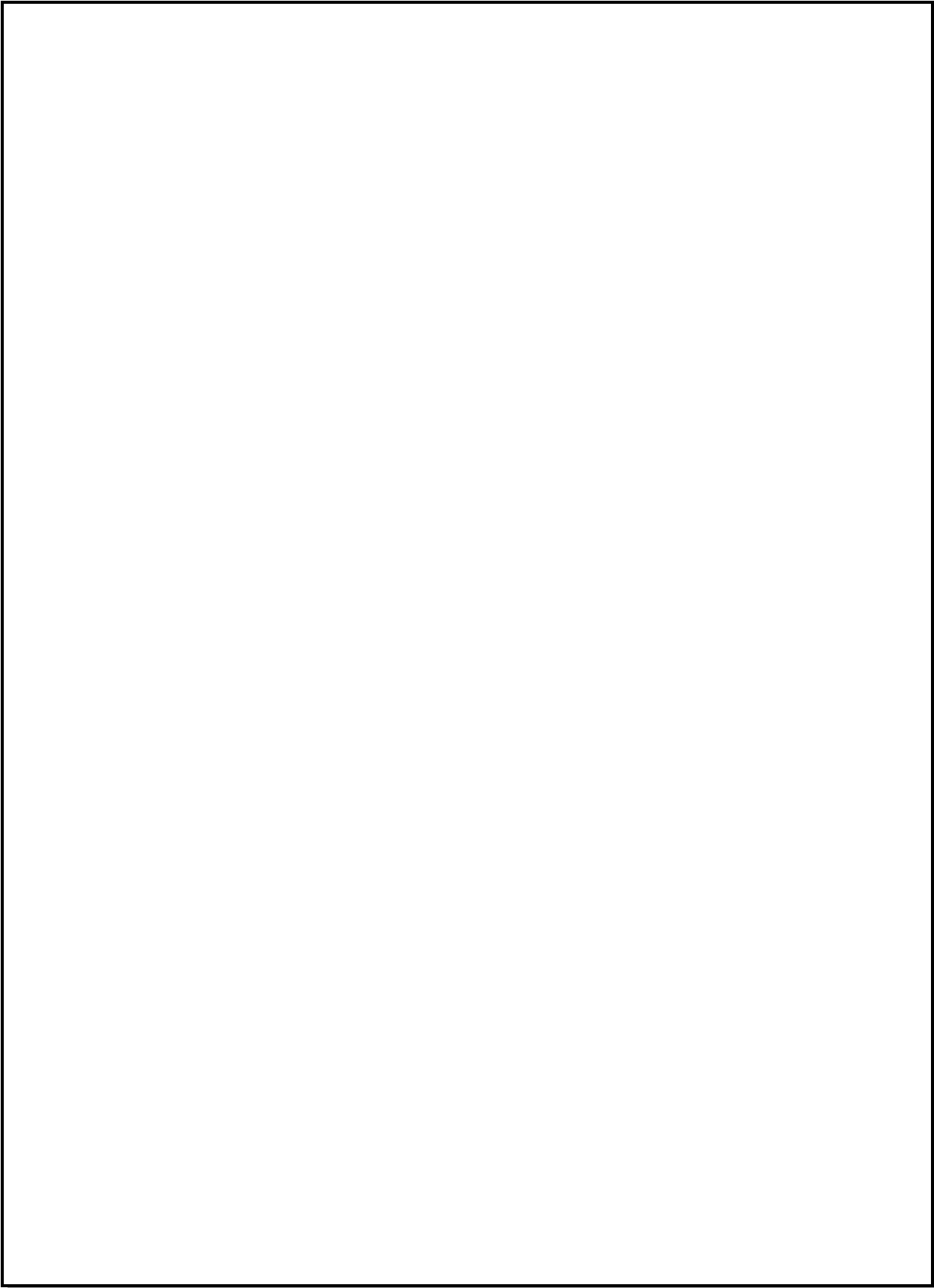
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

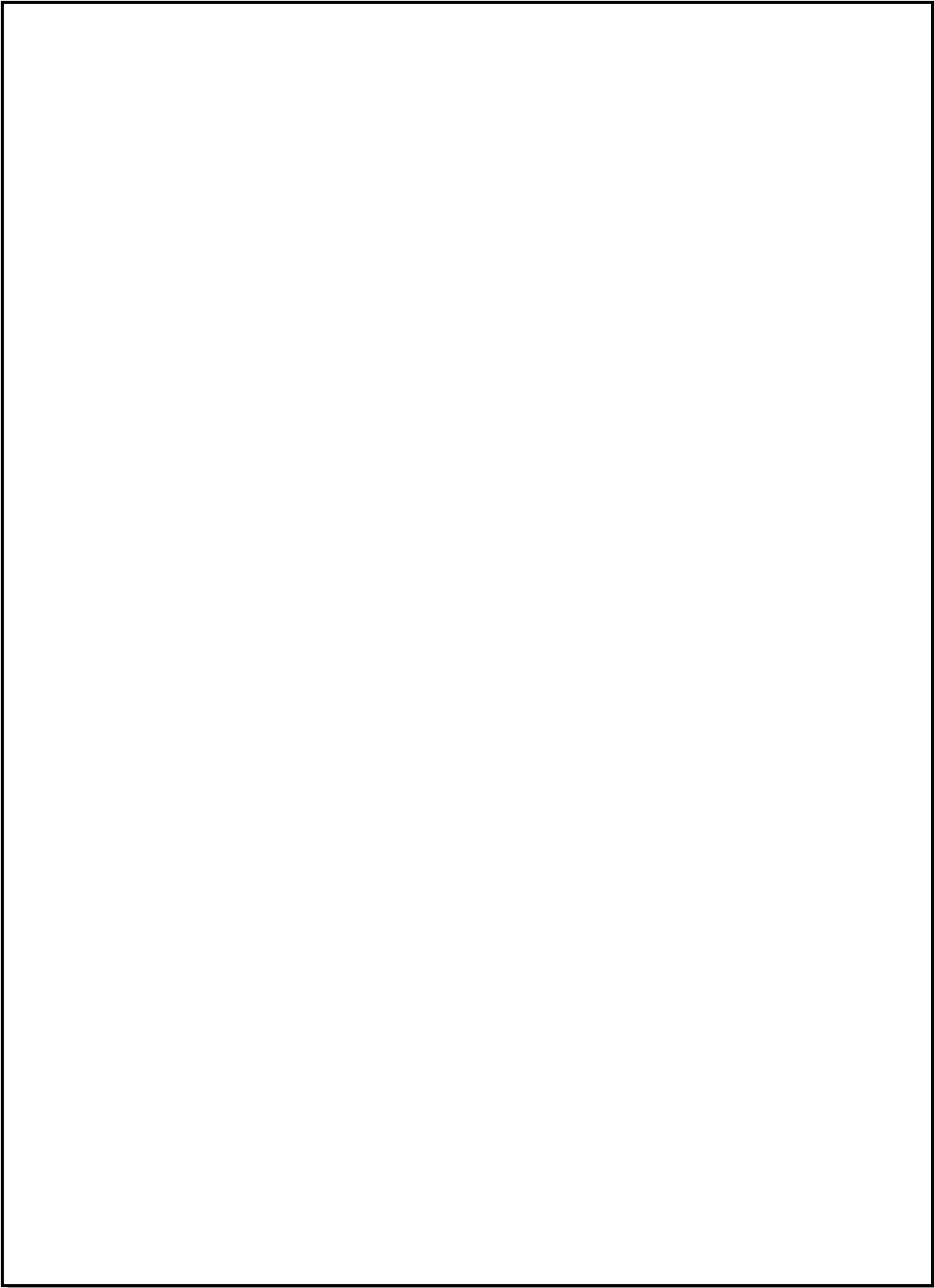
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

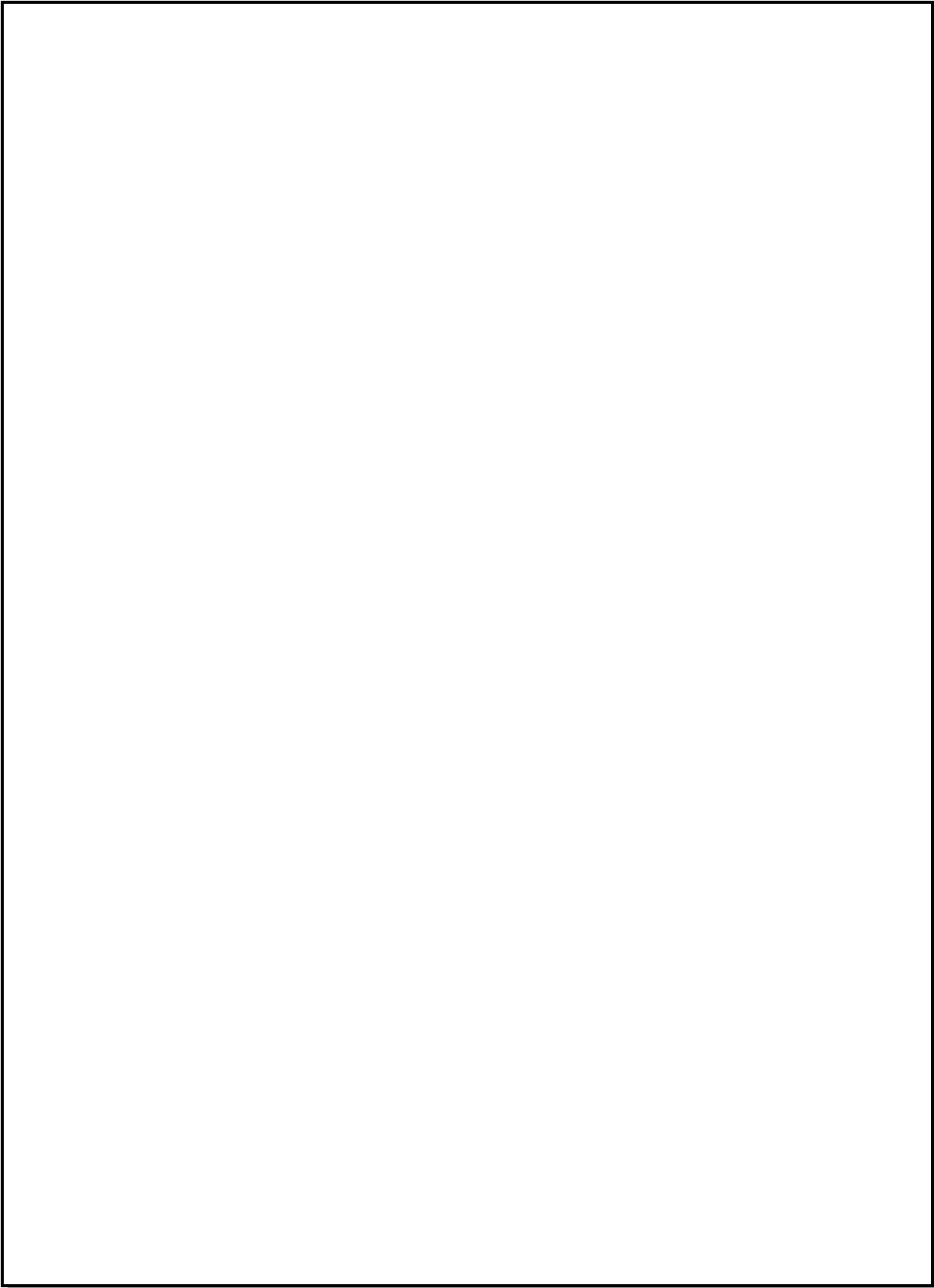
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

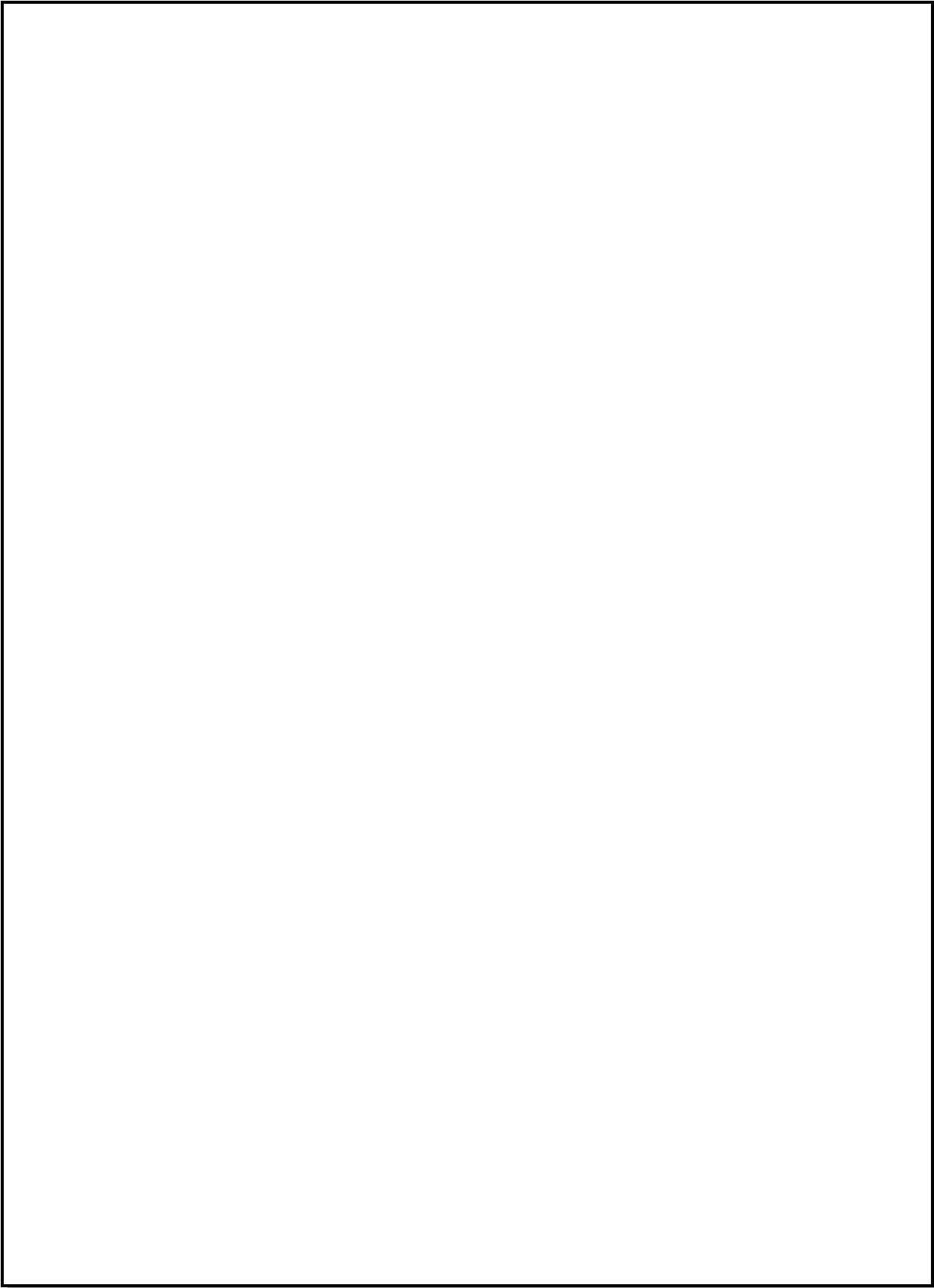
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

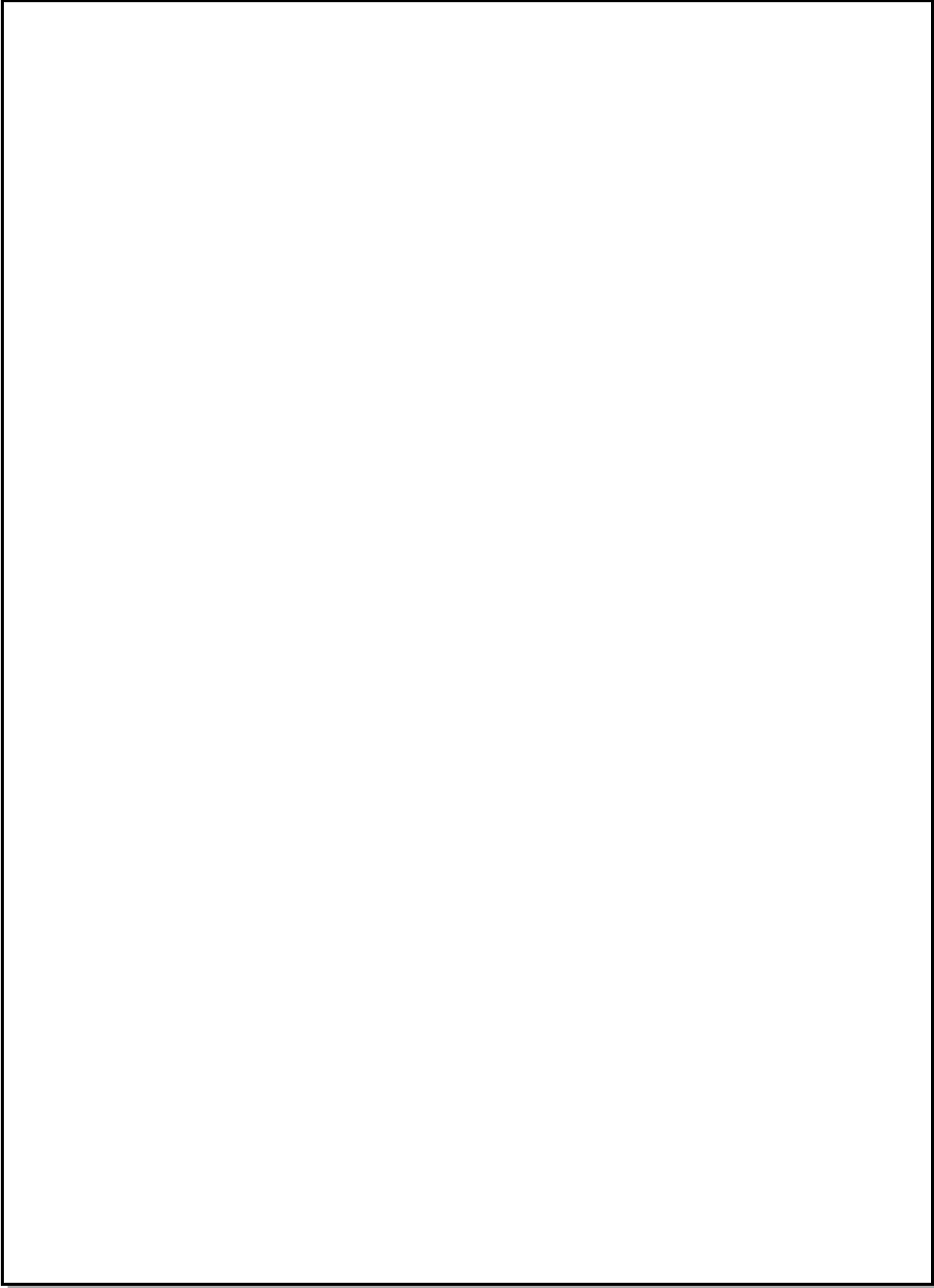
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

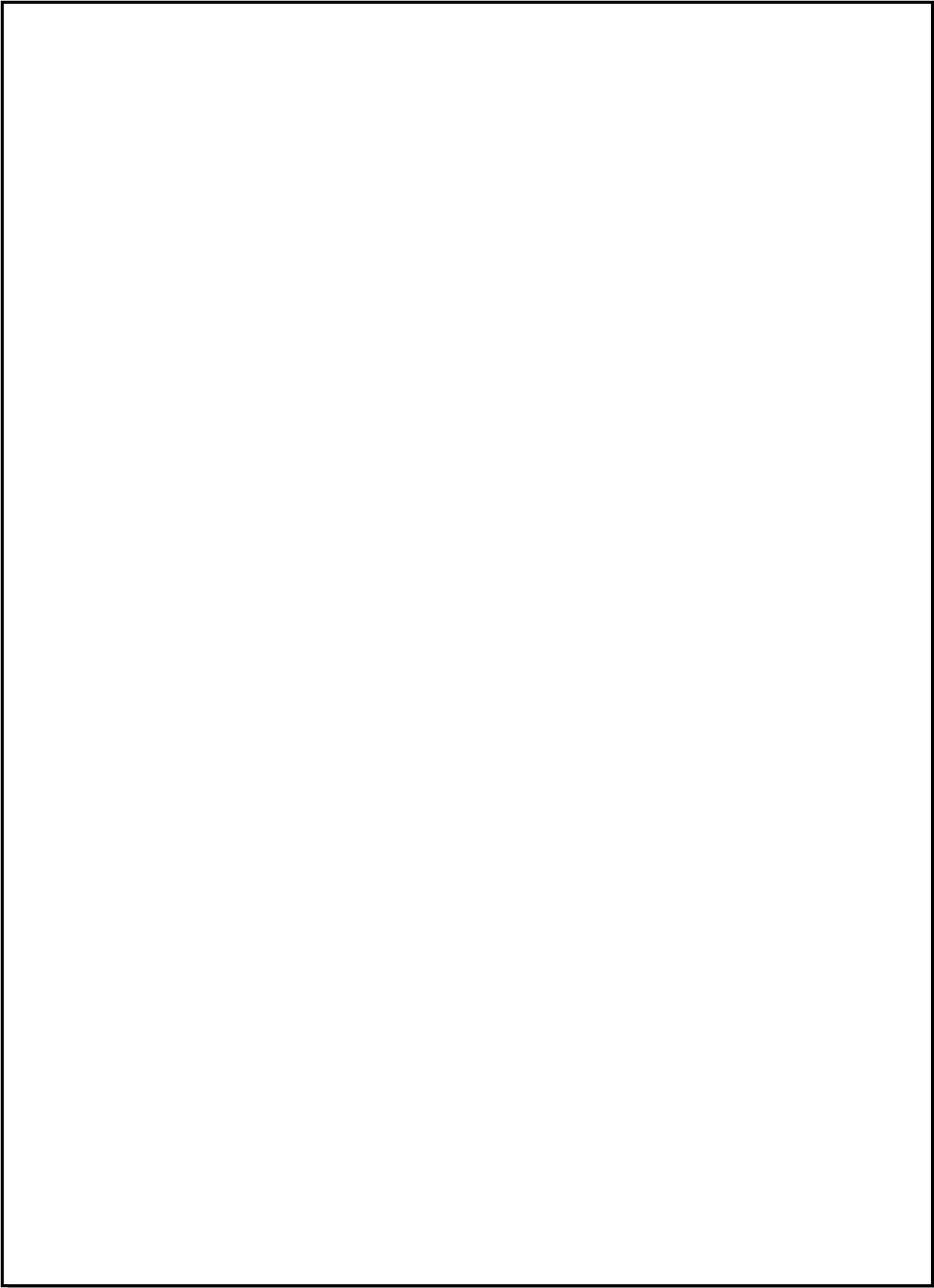
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

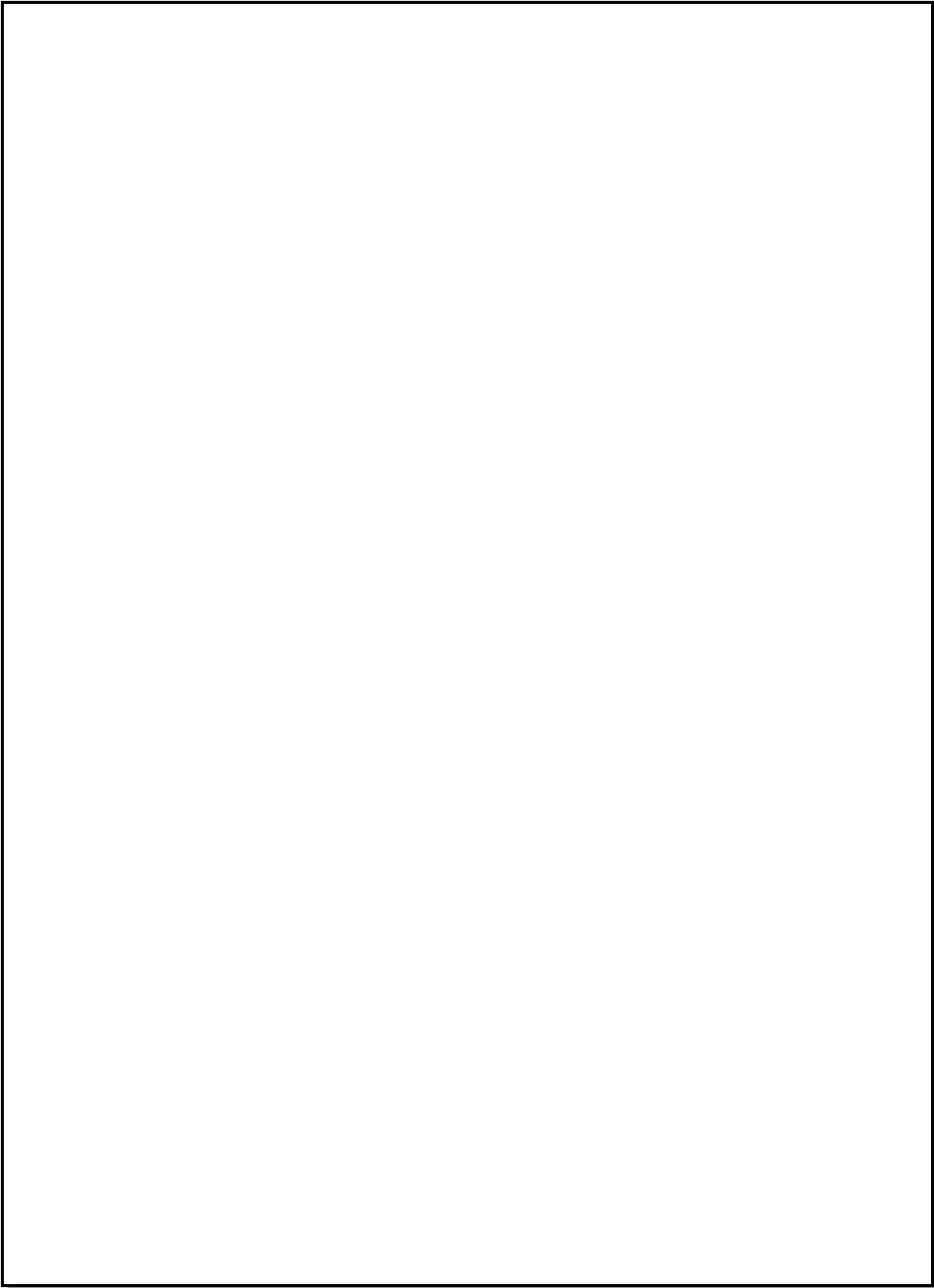
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

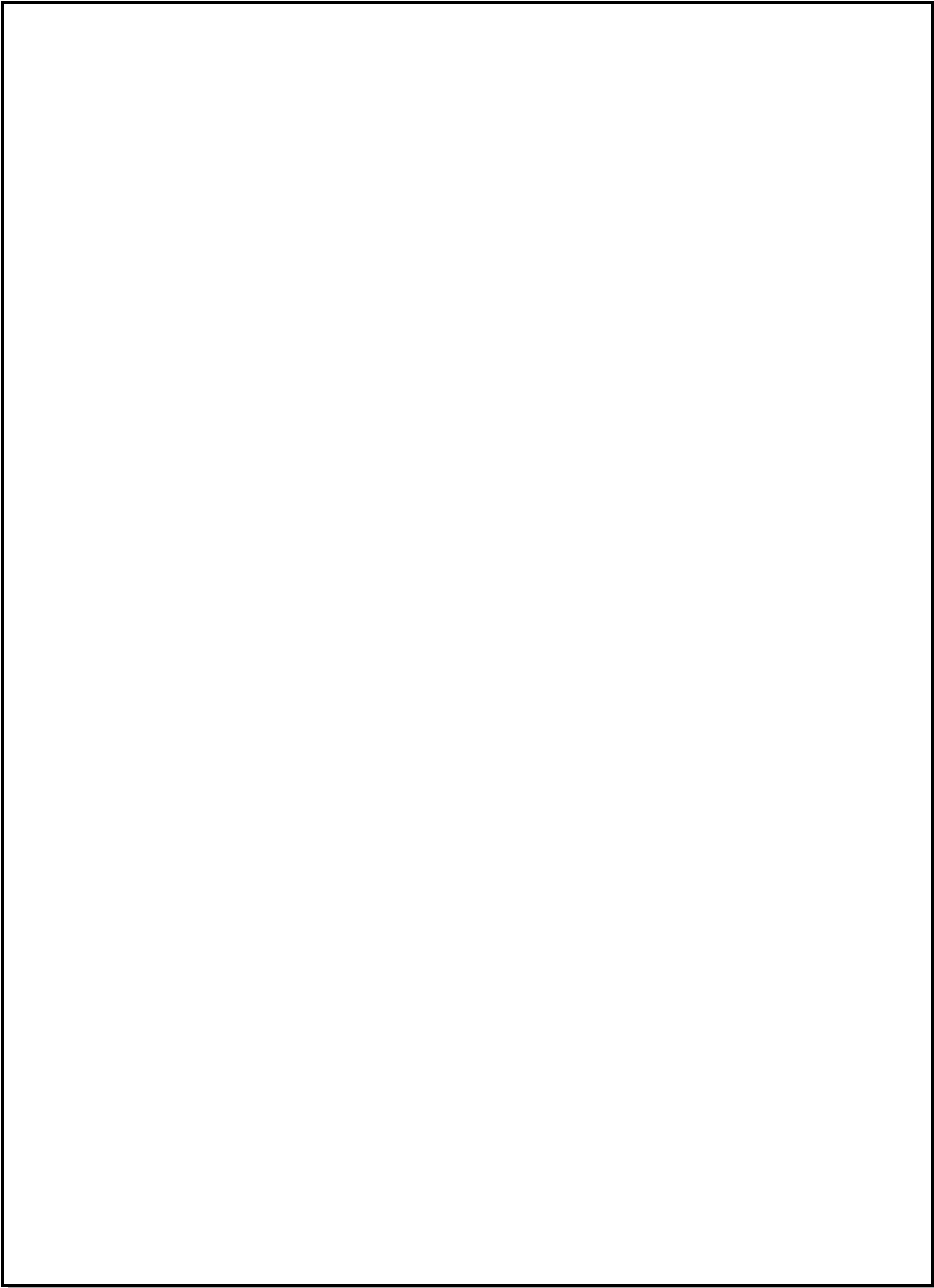
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

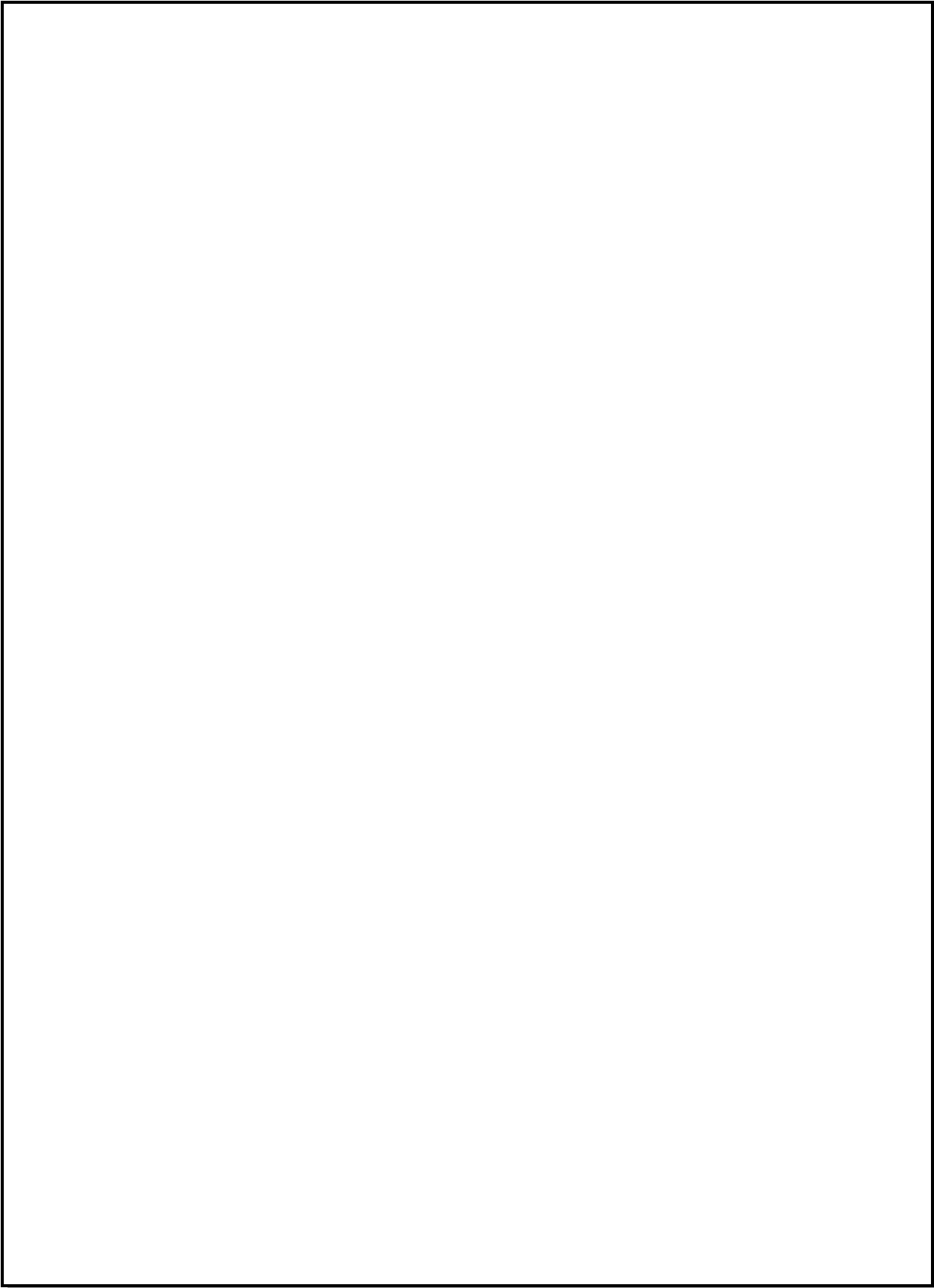
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

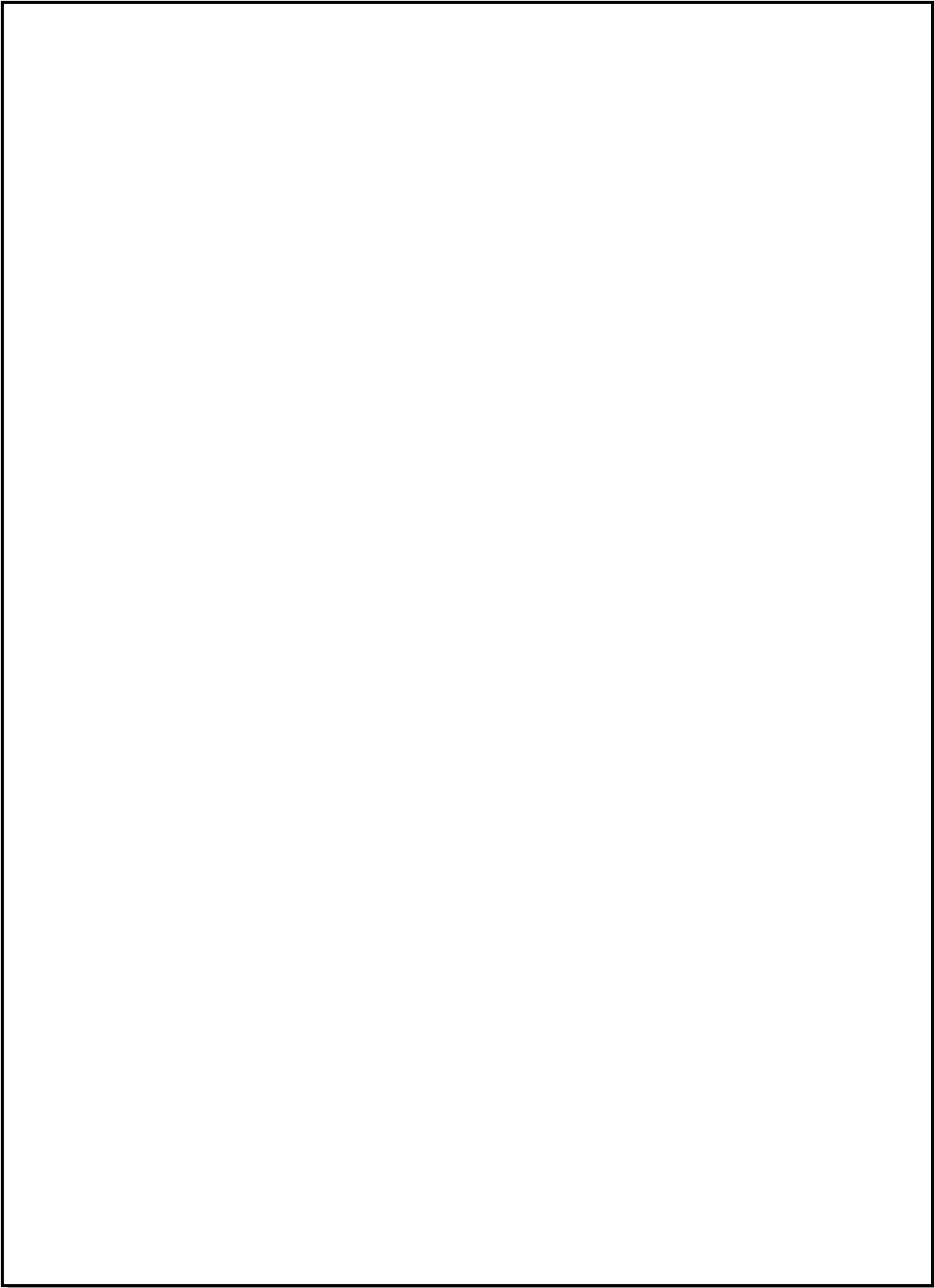
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

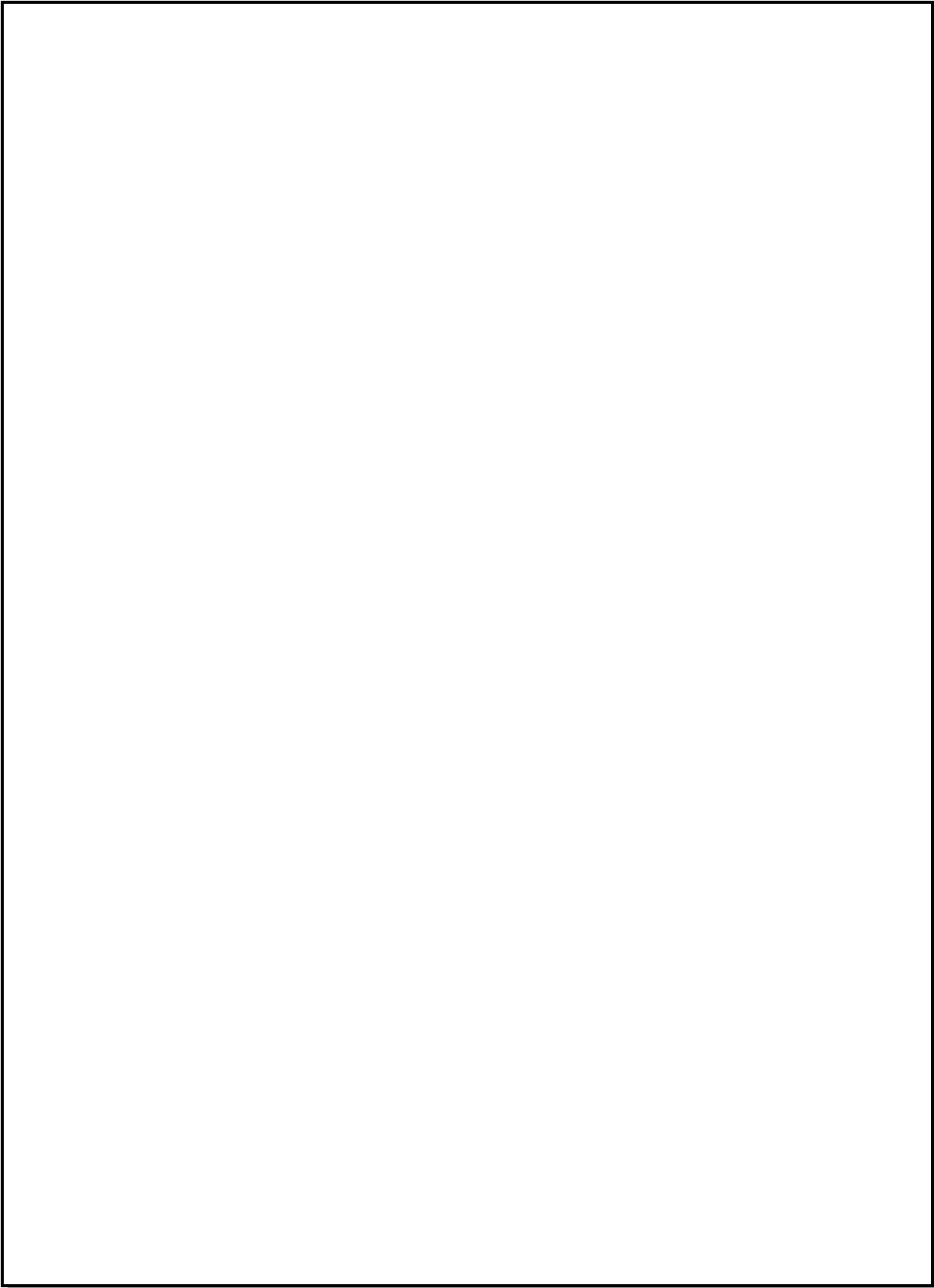
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

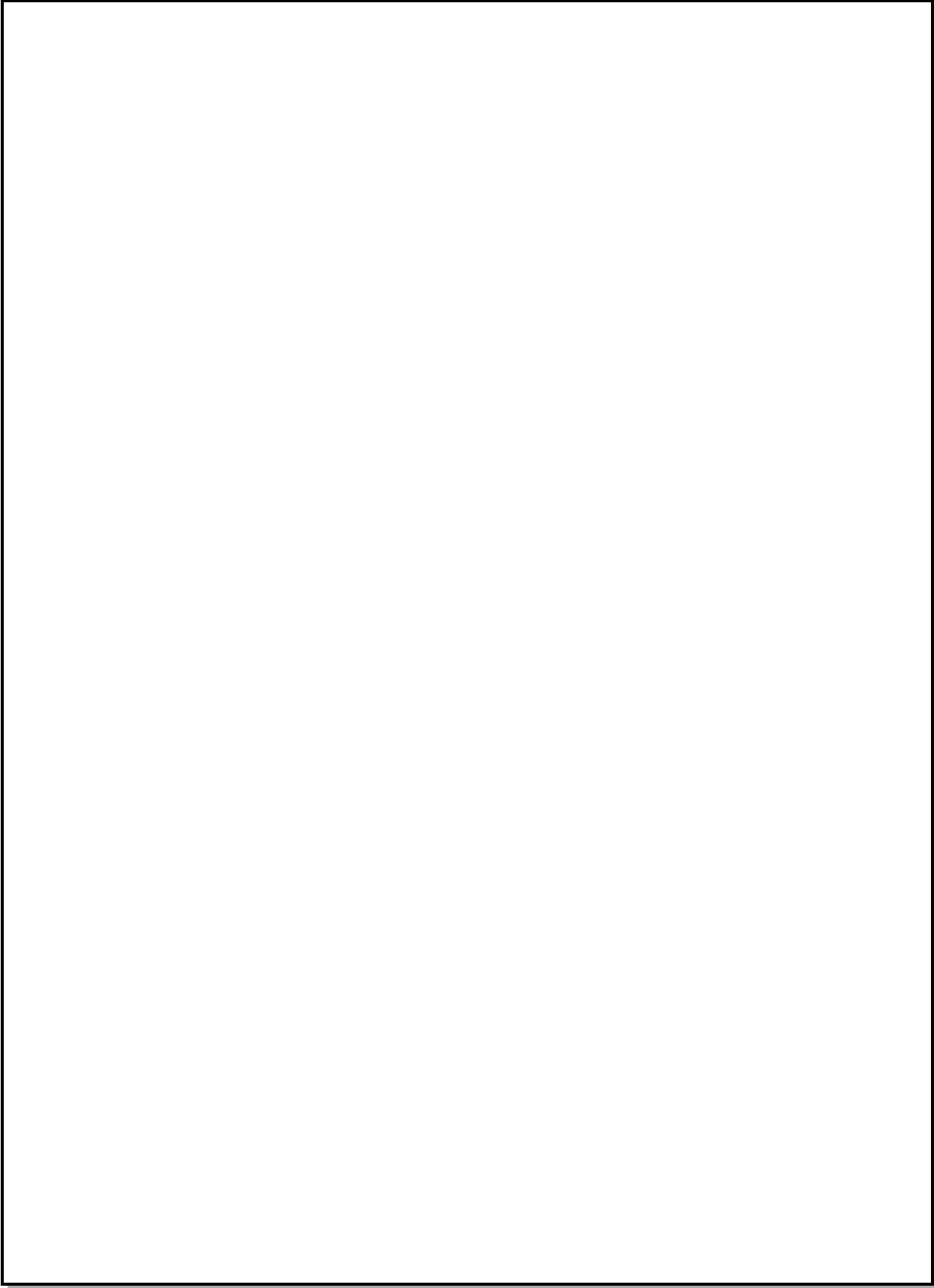
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

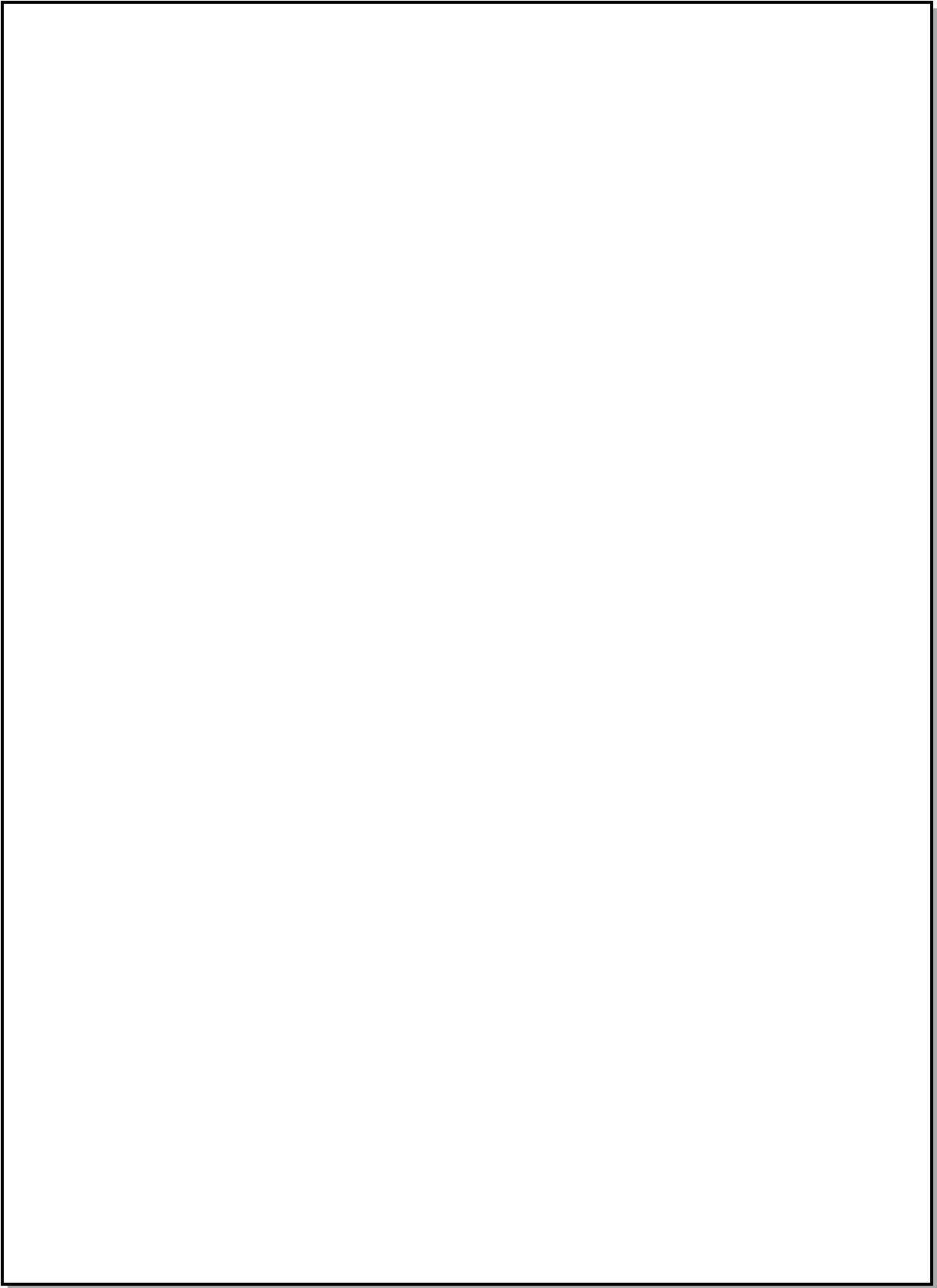
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

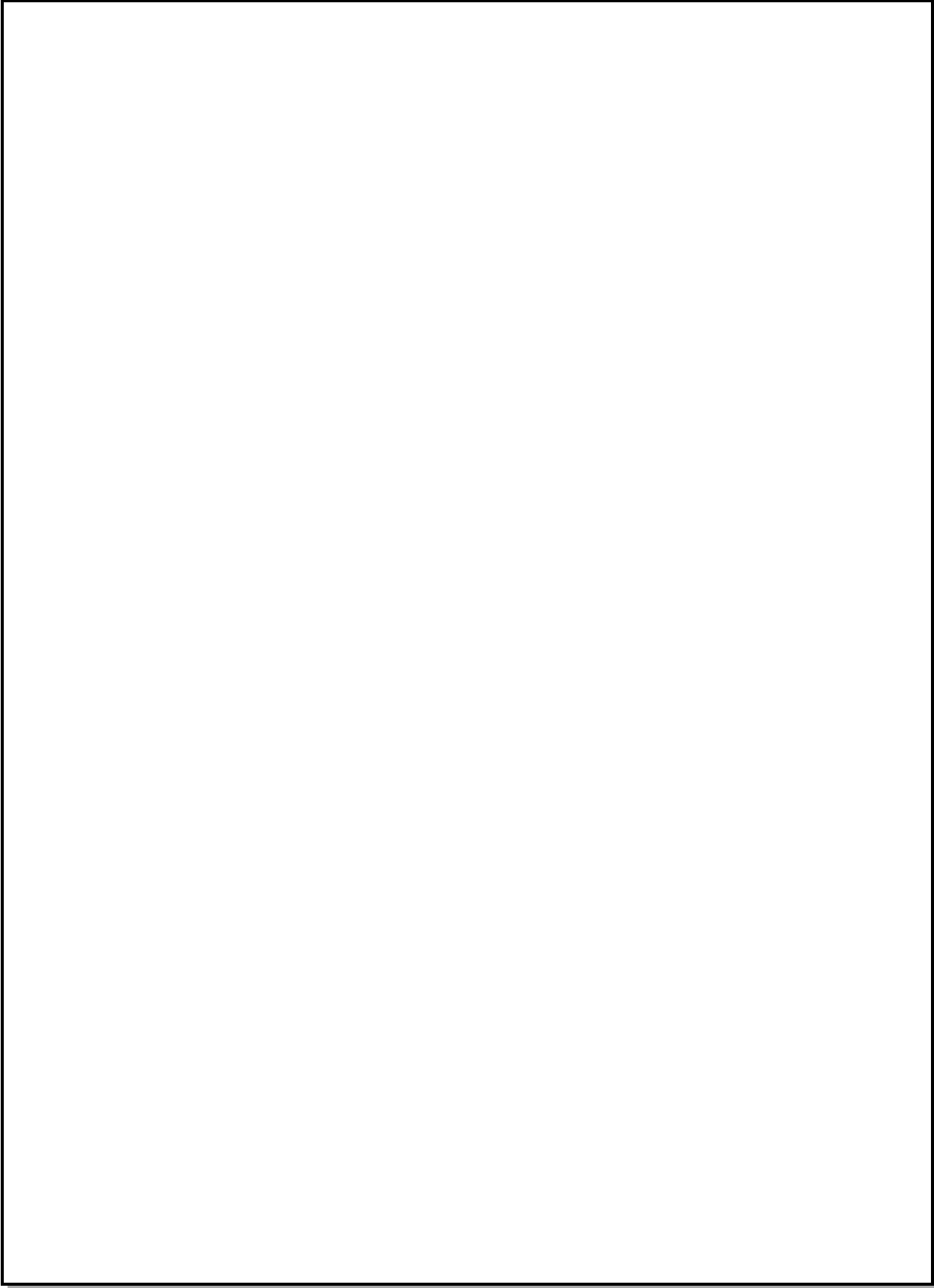
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

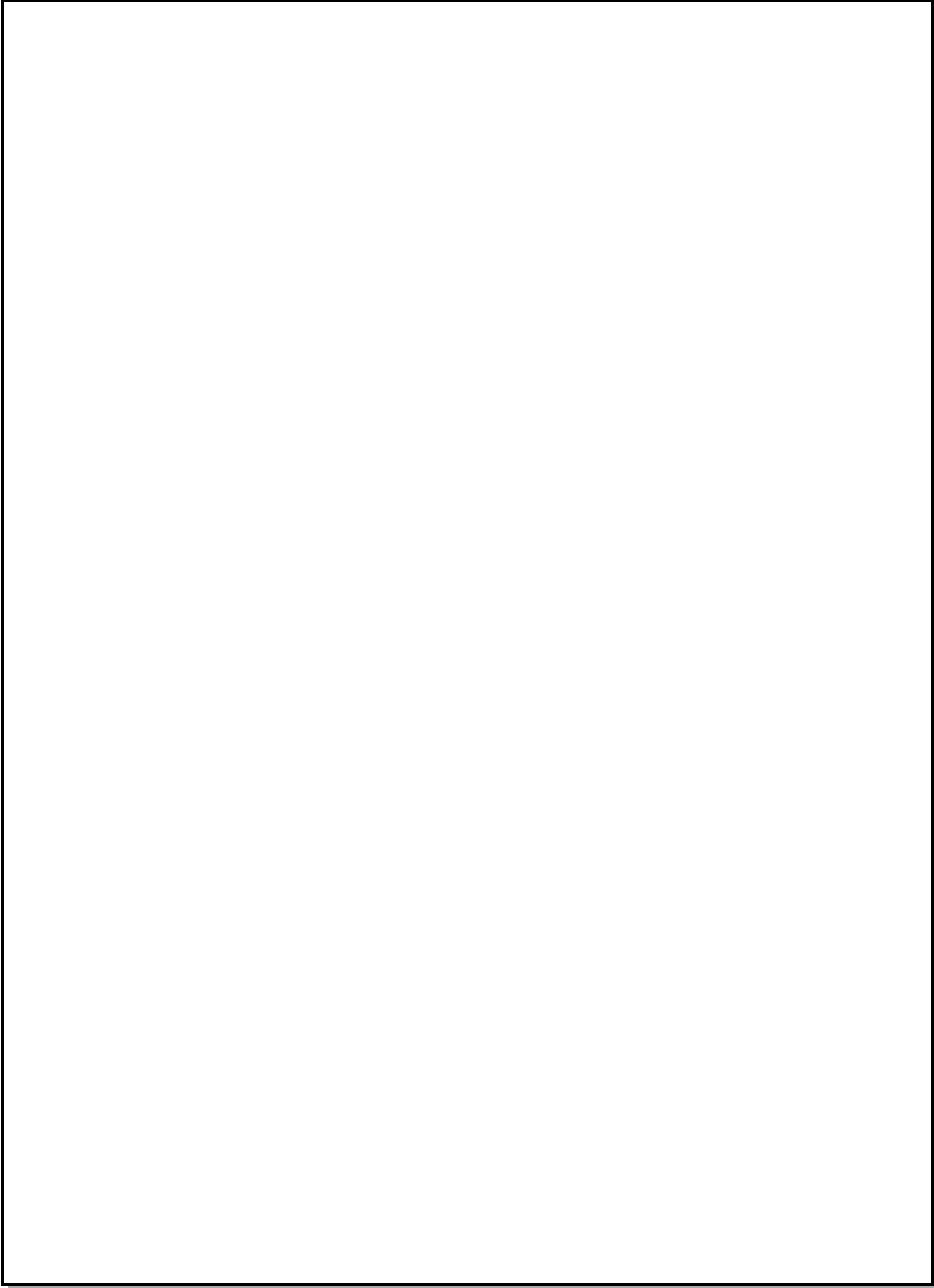
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

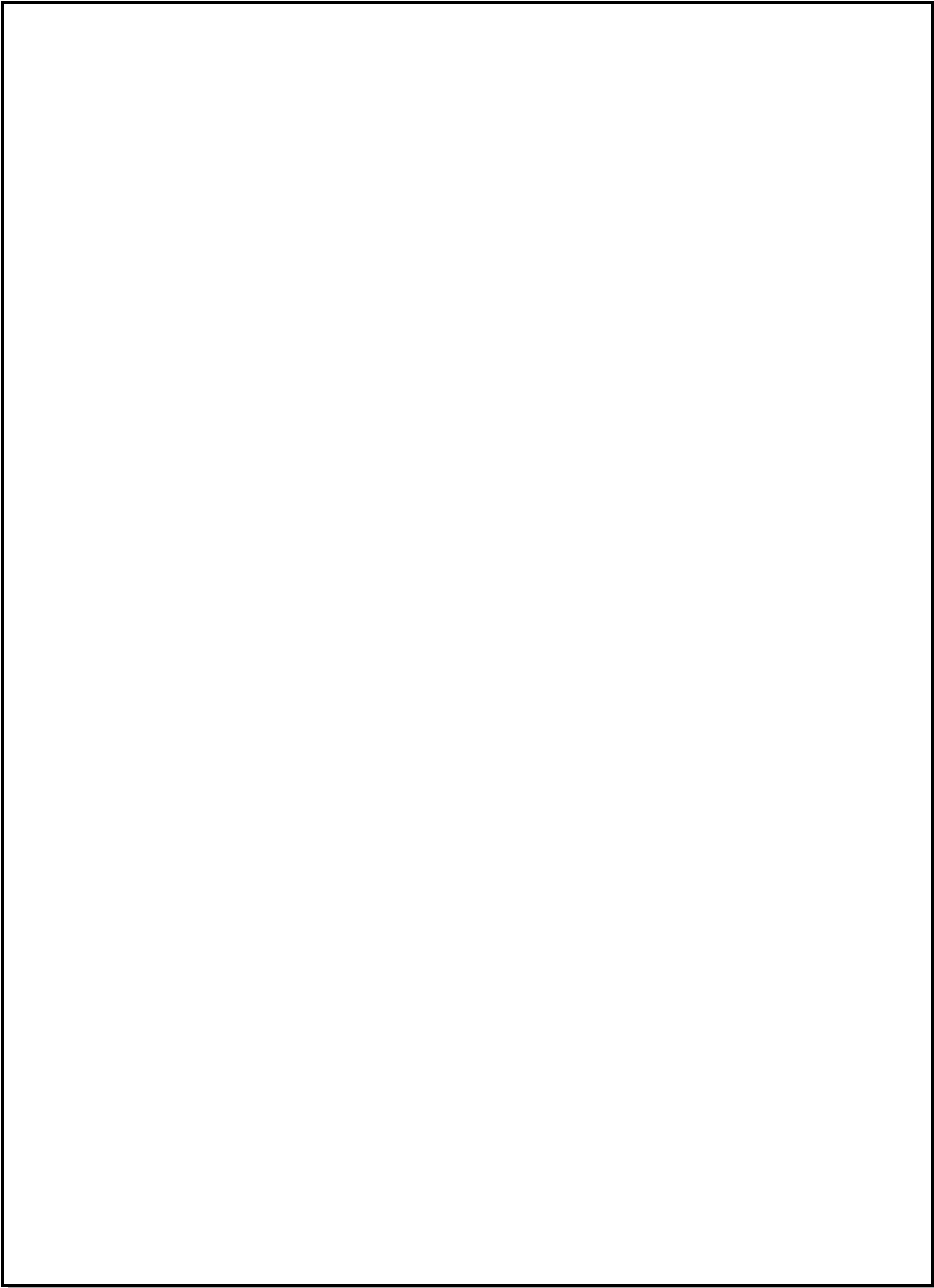
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

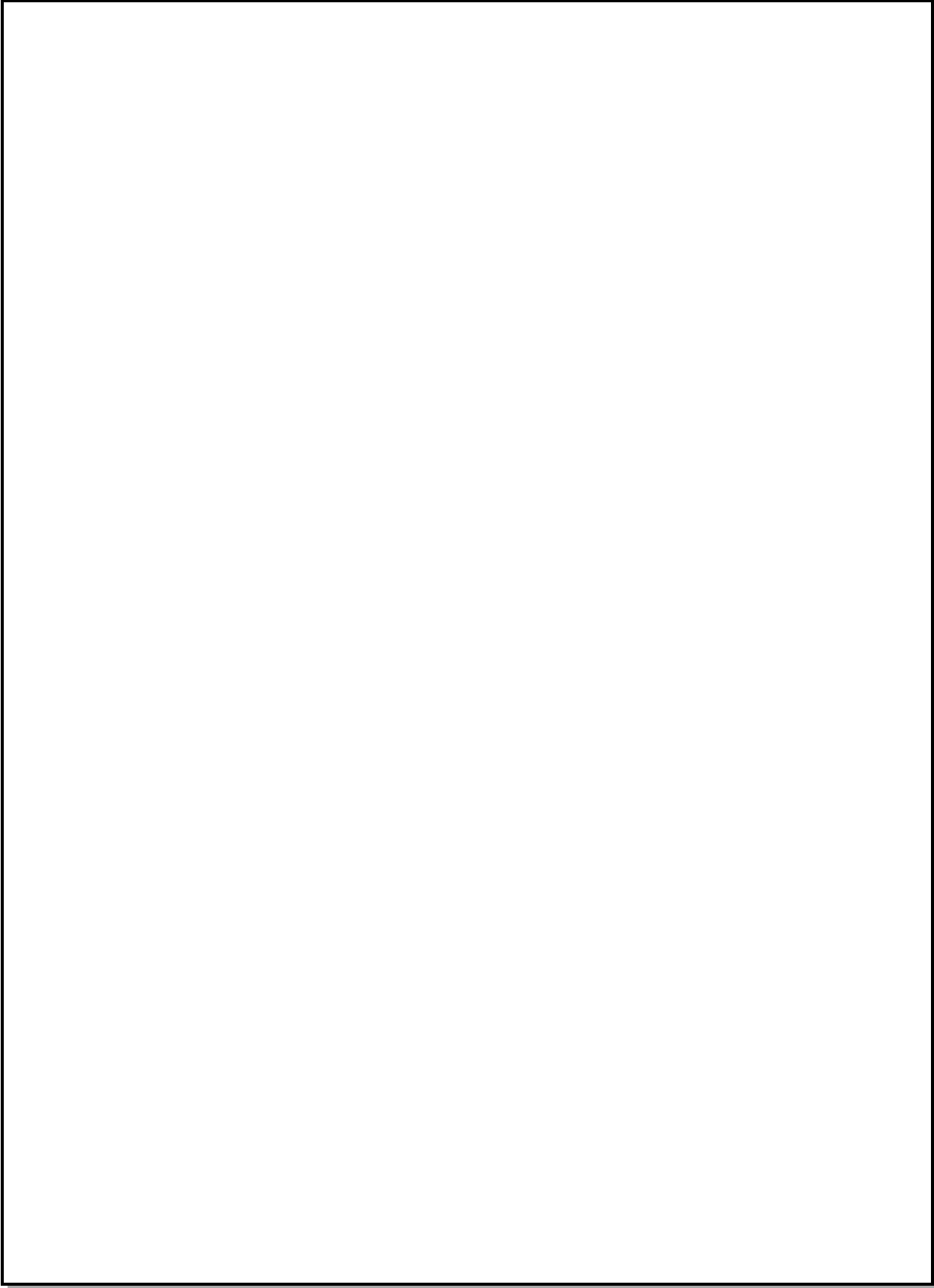
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

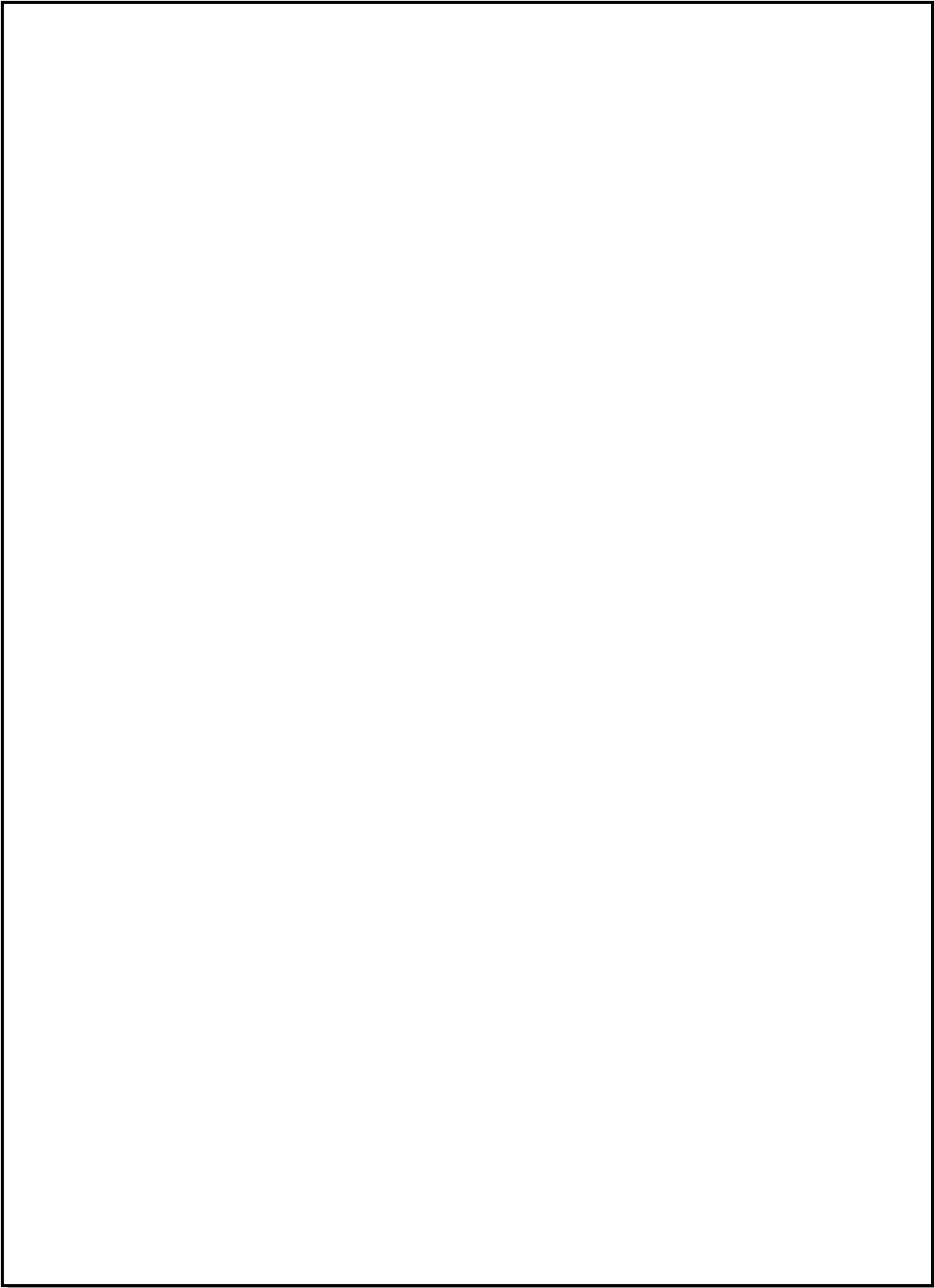
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

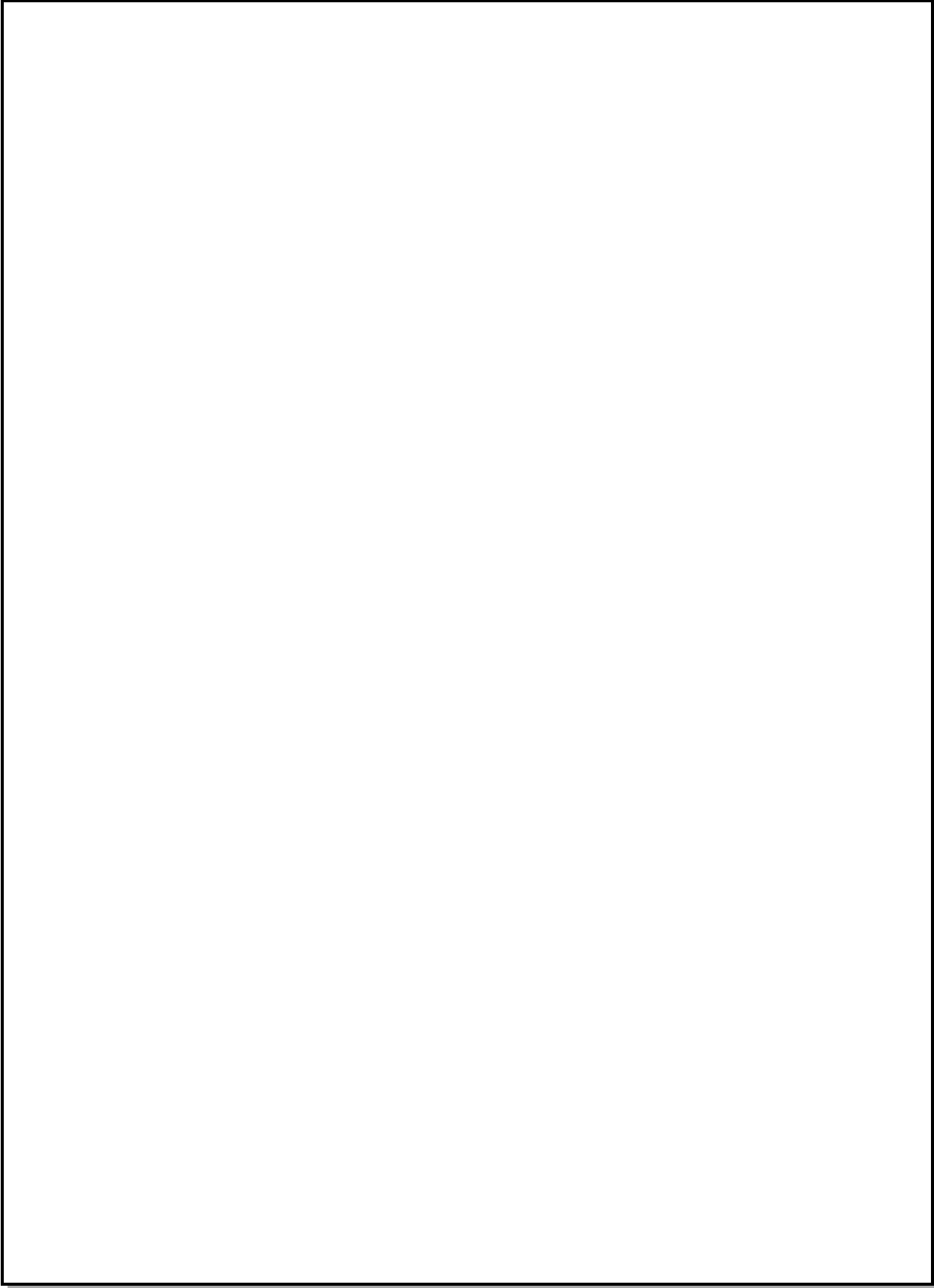


CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

200

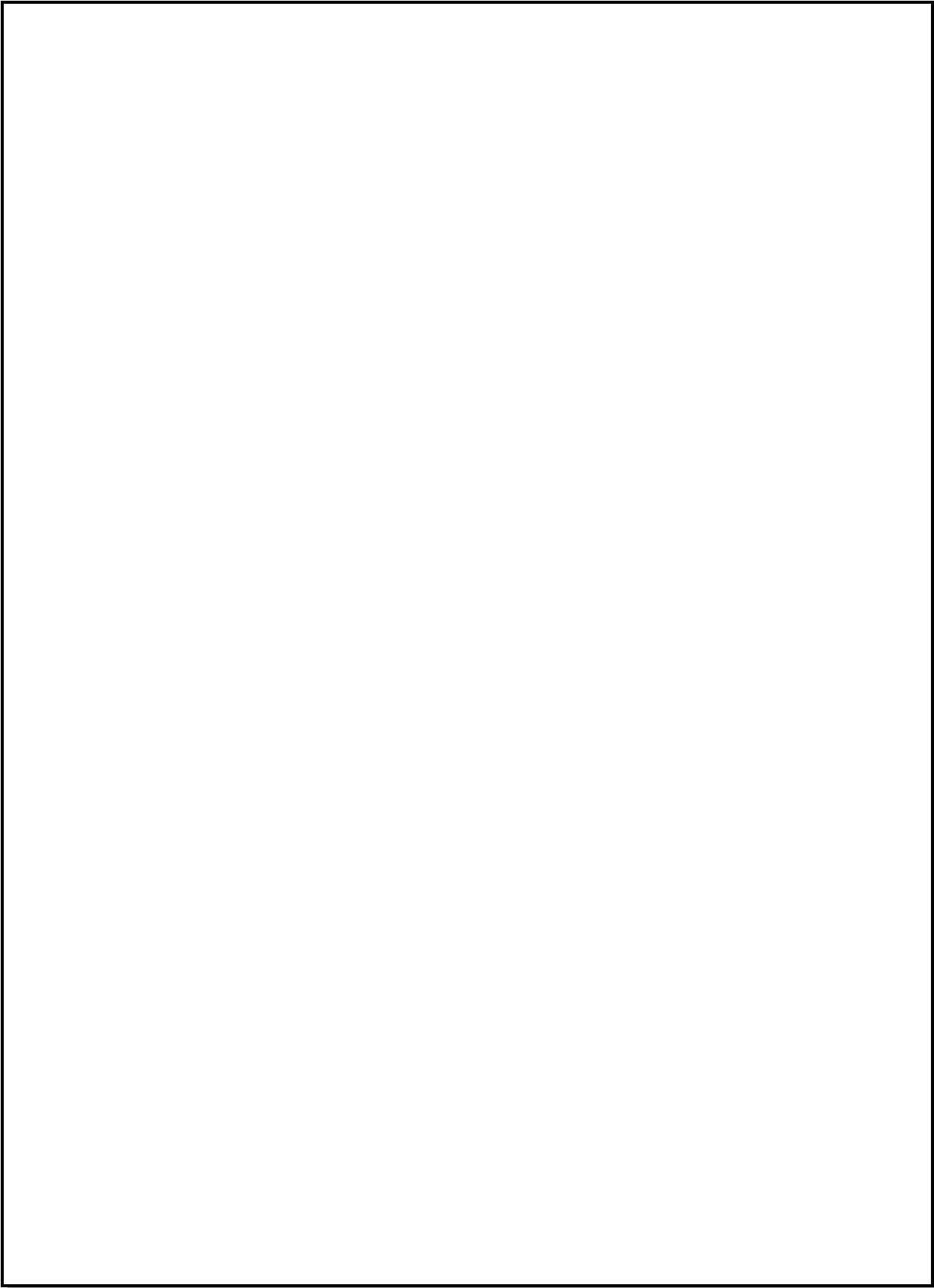
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

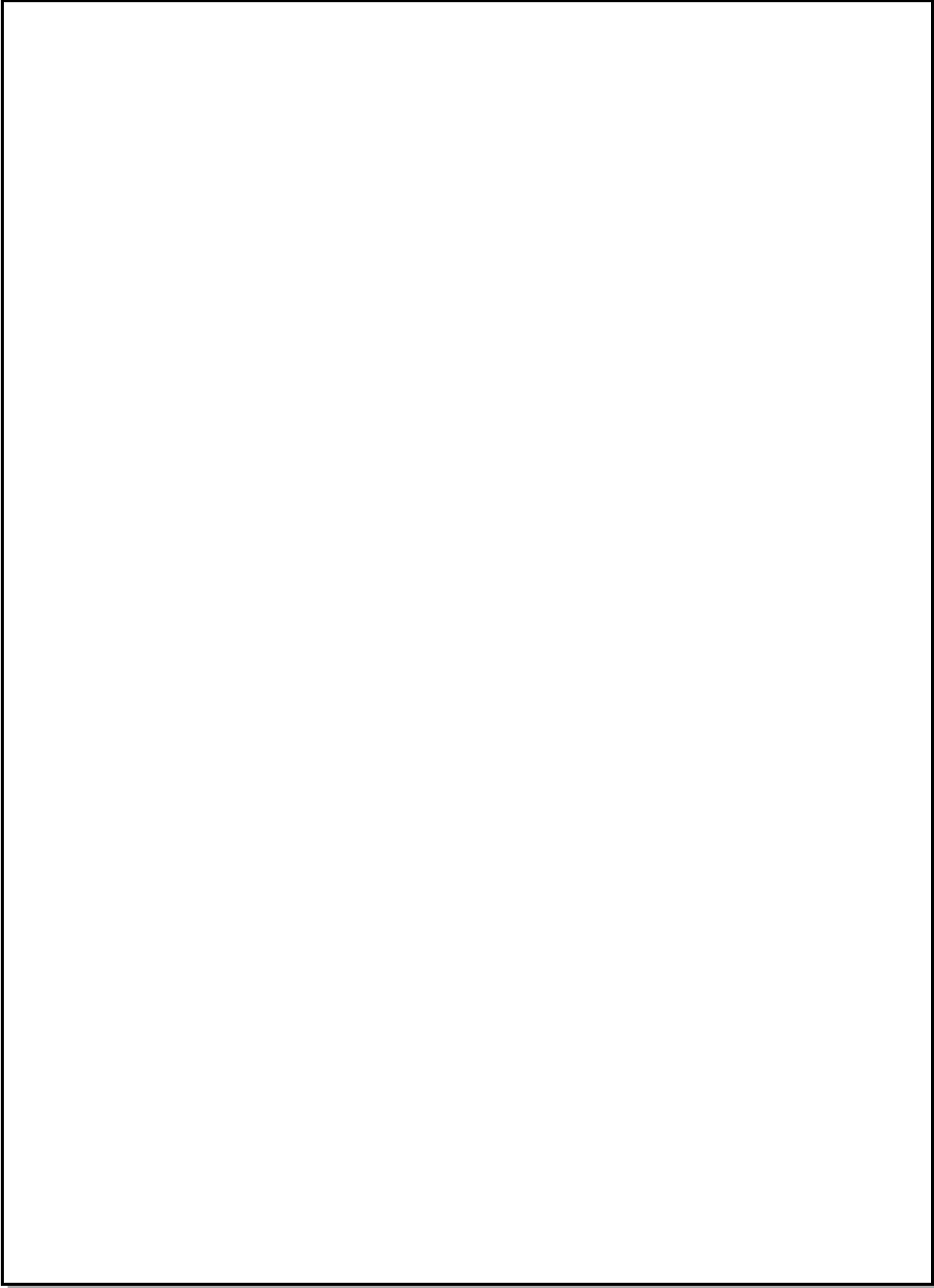
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

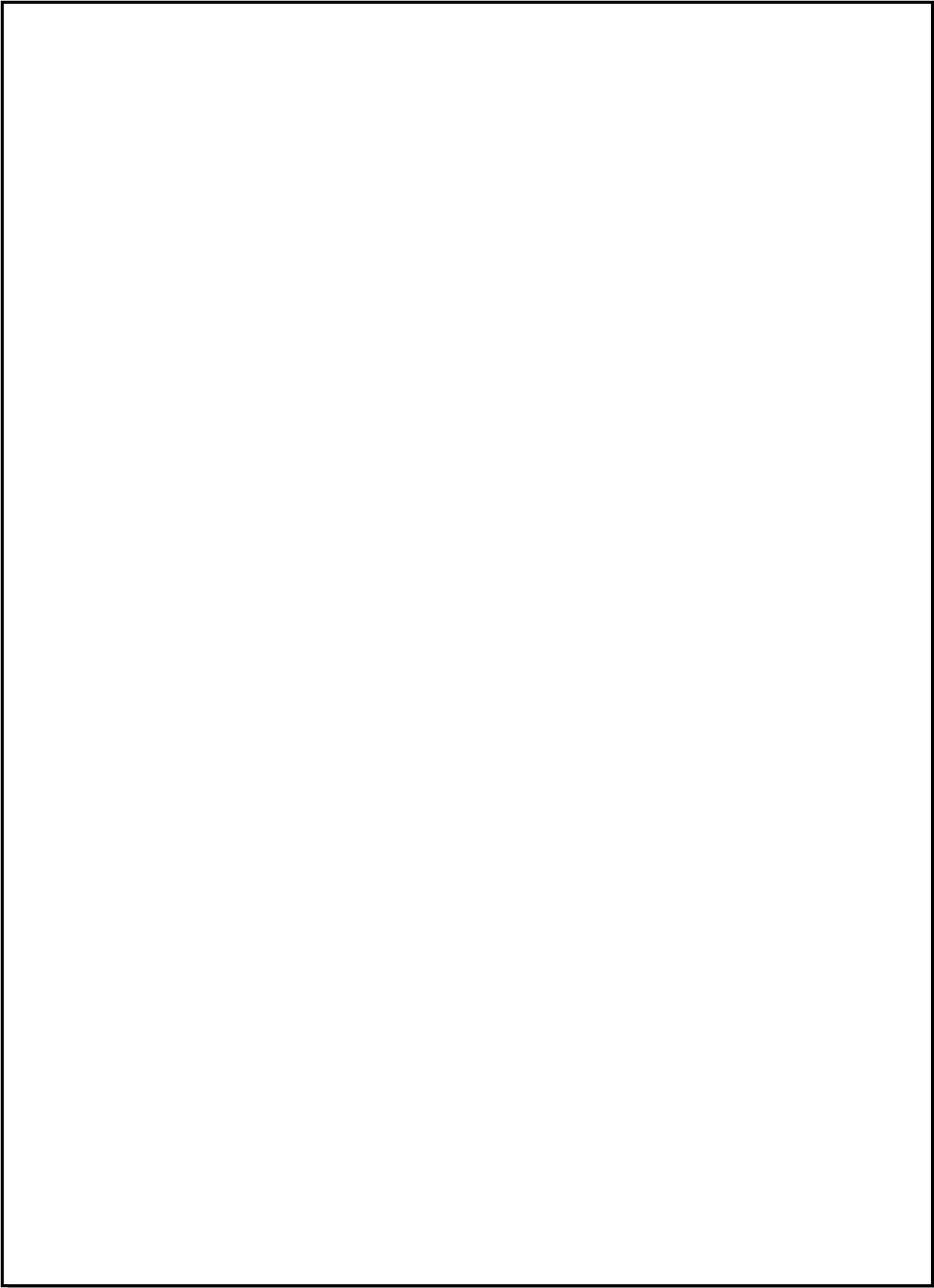
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

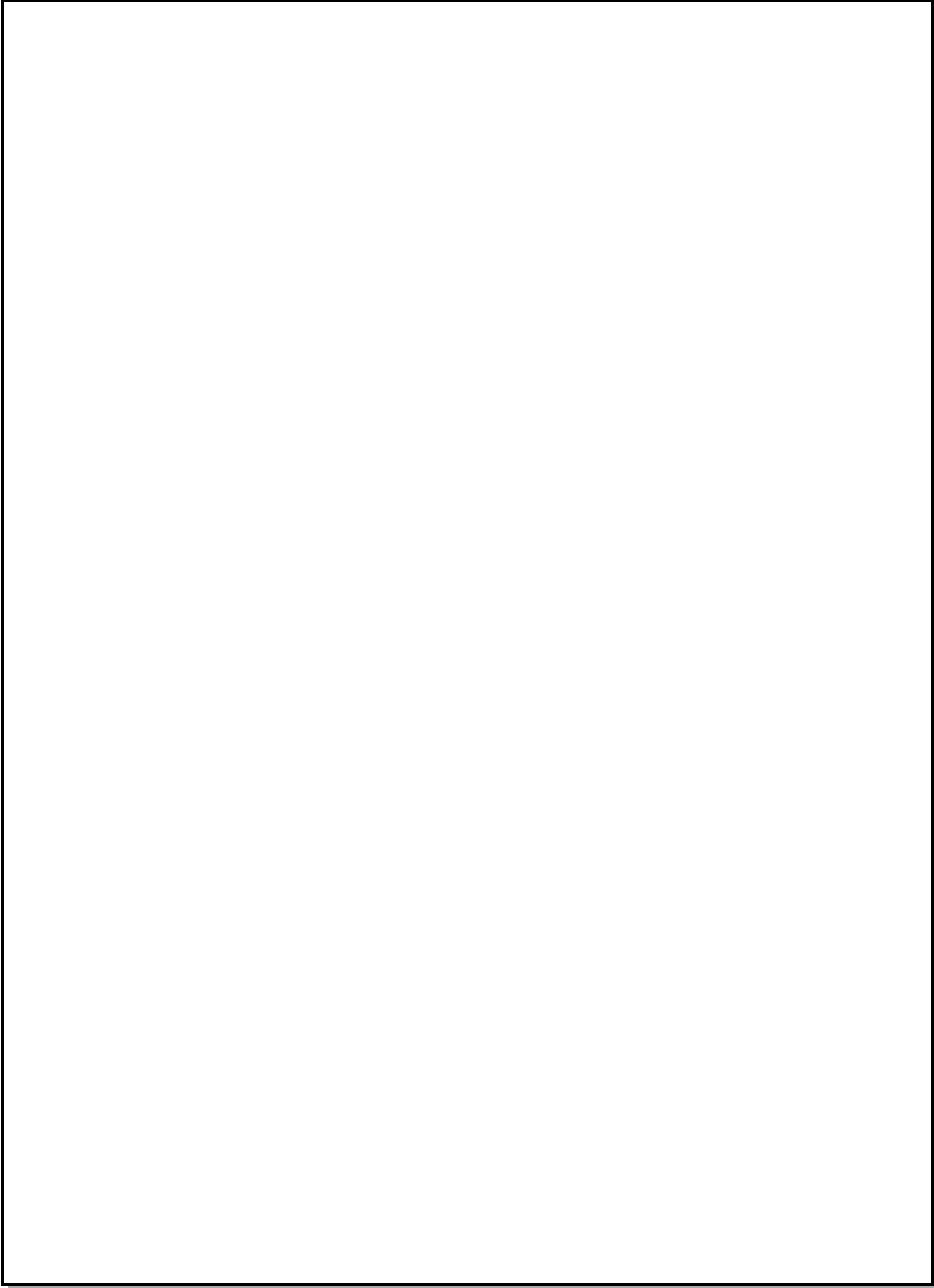
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

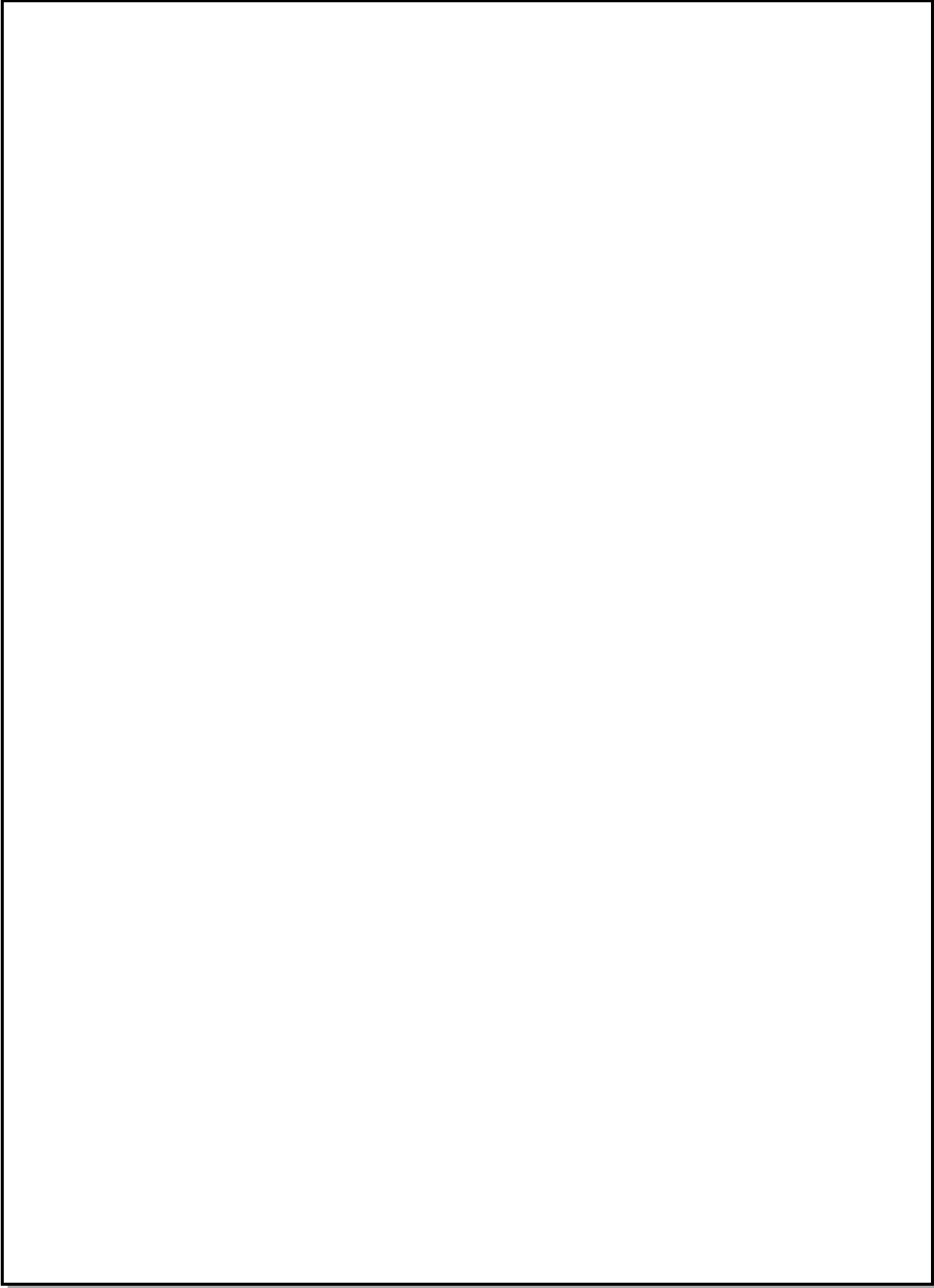
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

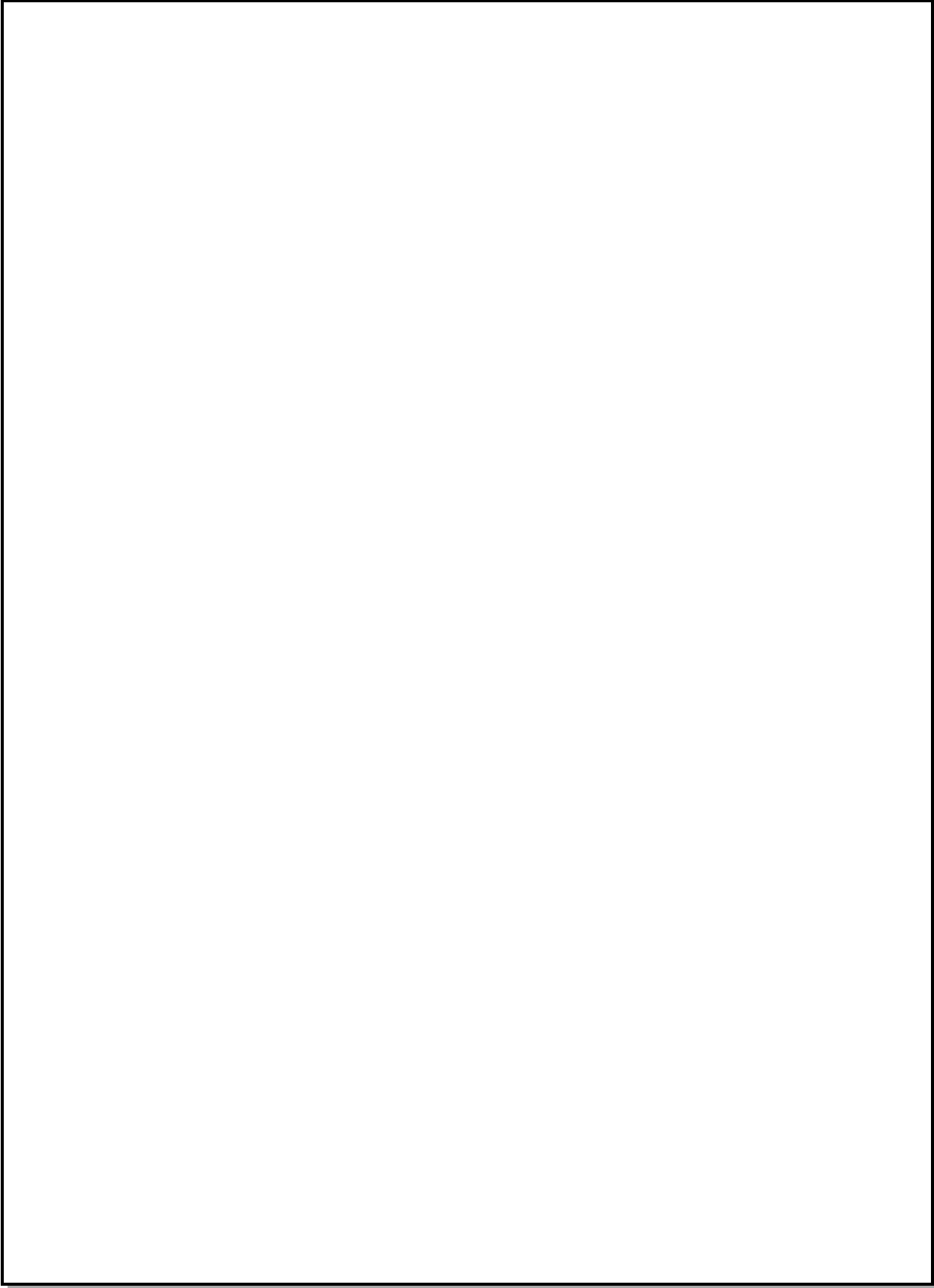
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

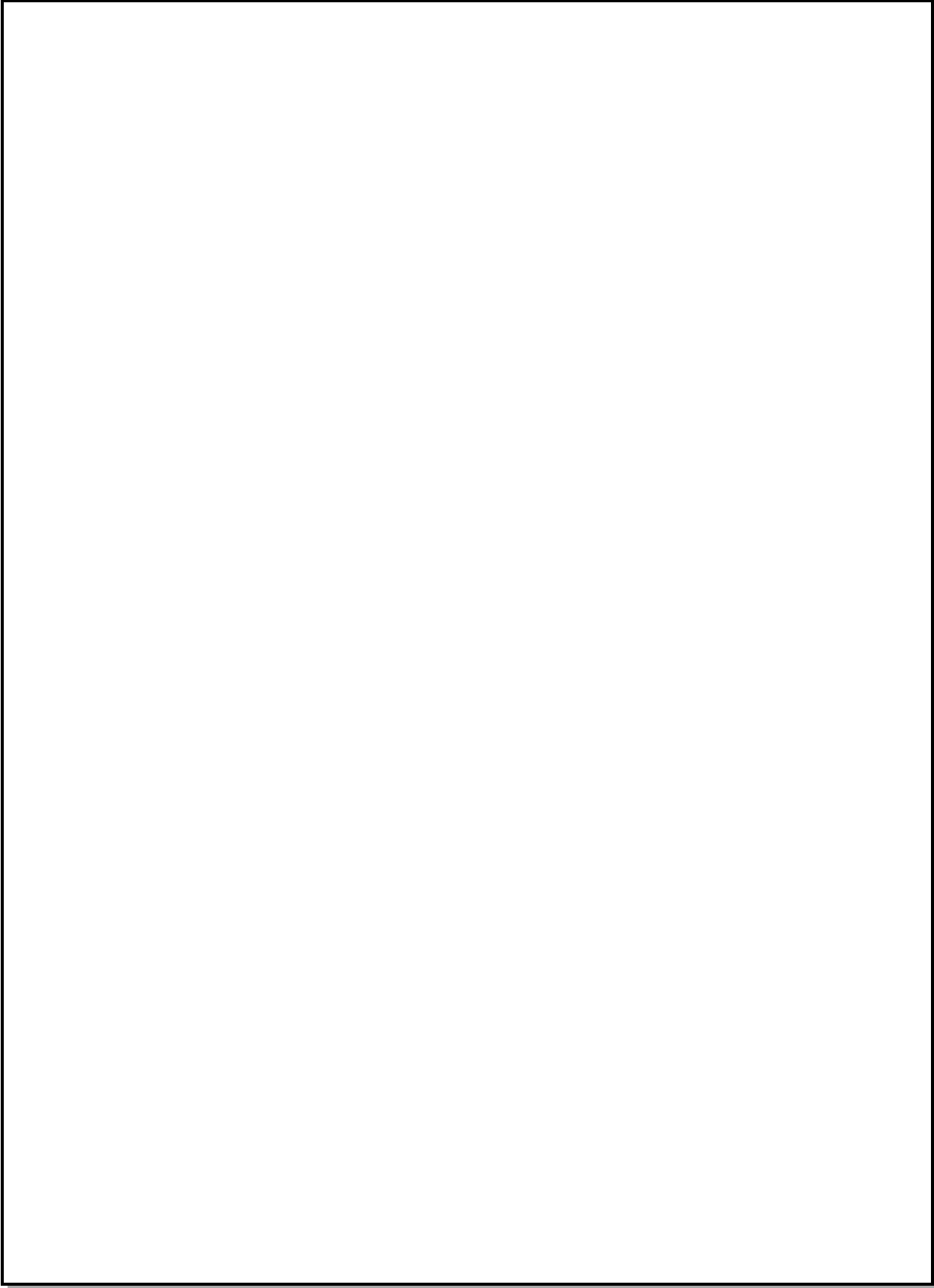
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

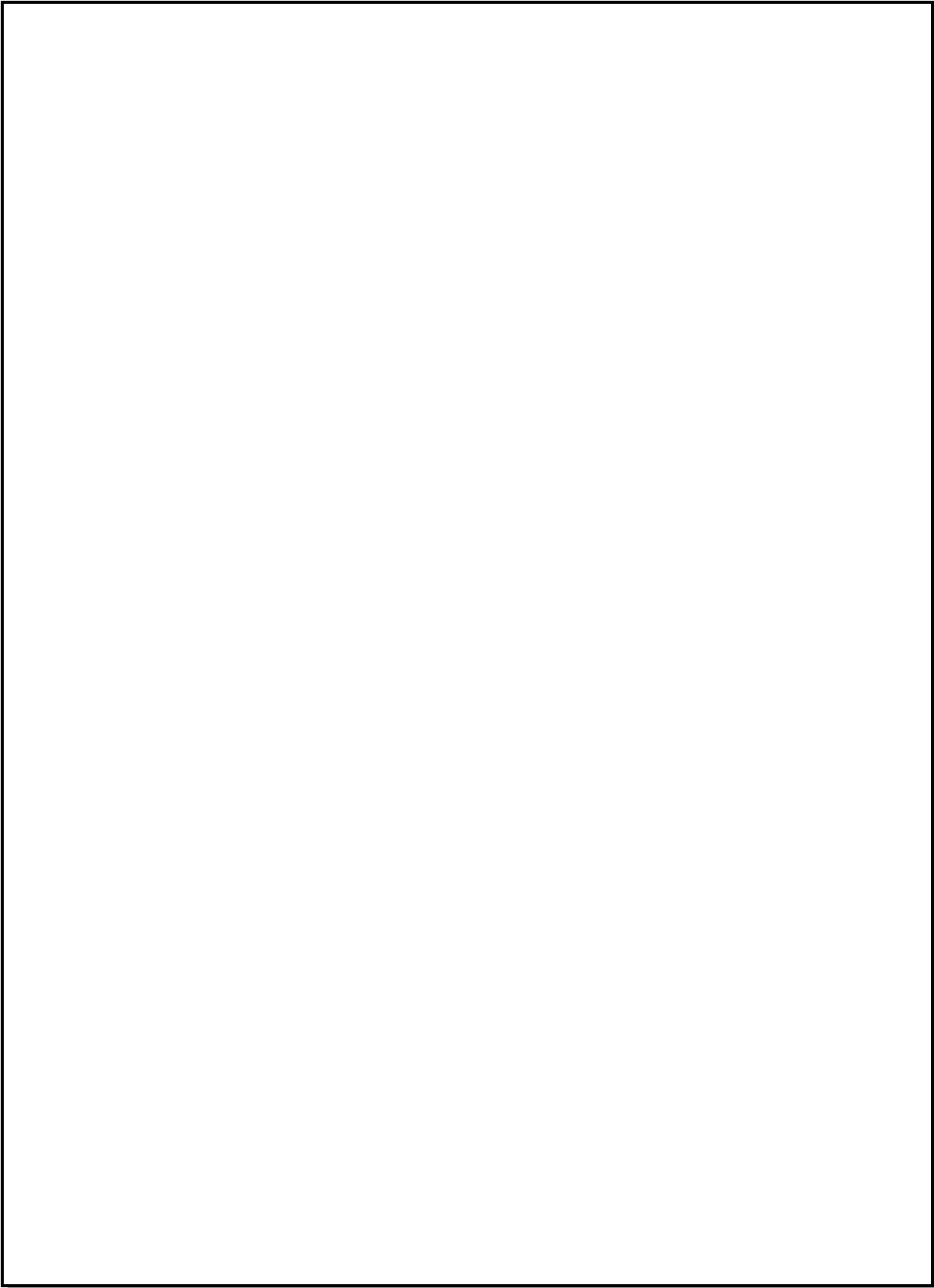
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

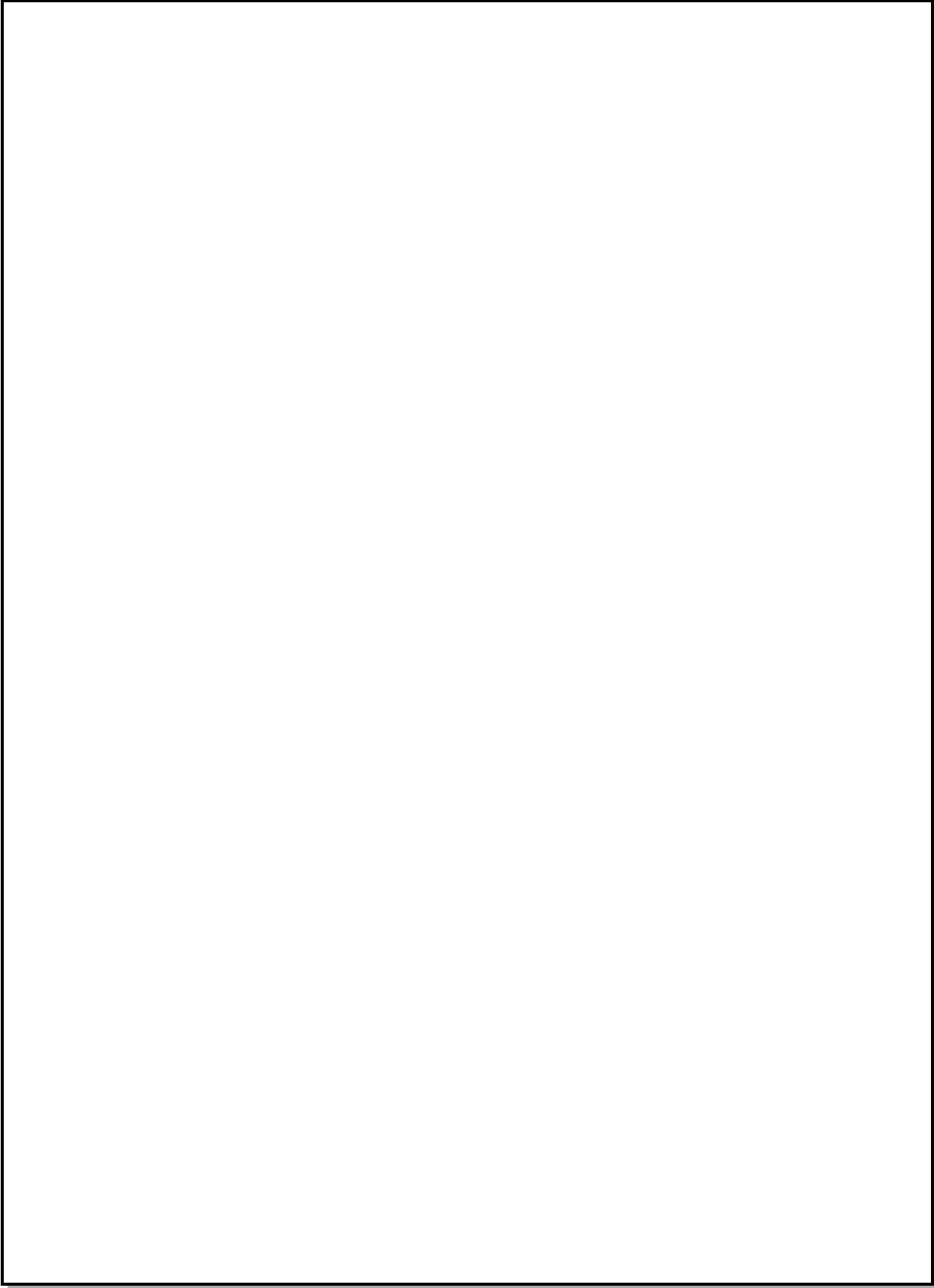
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

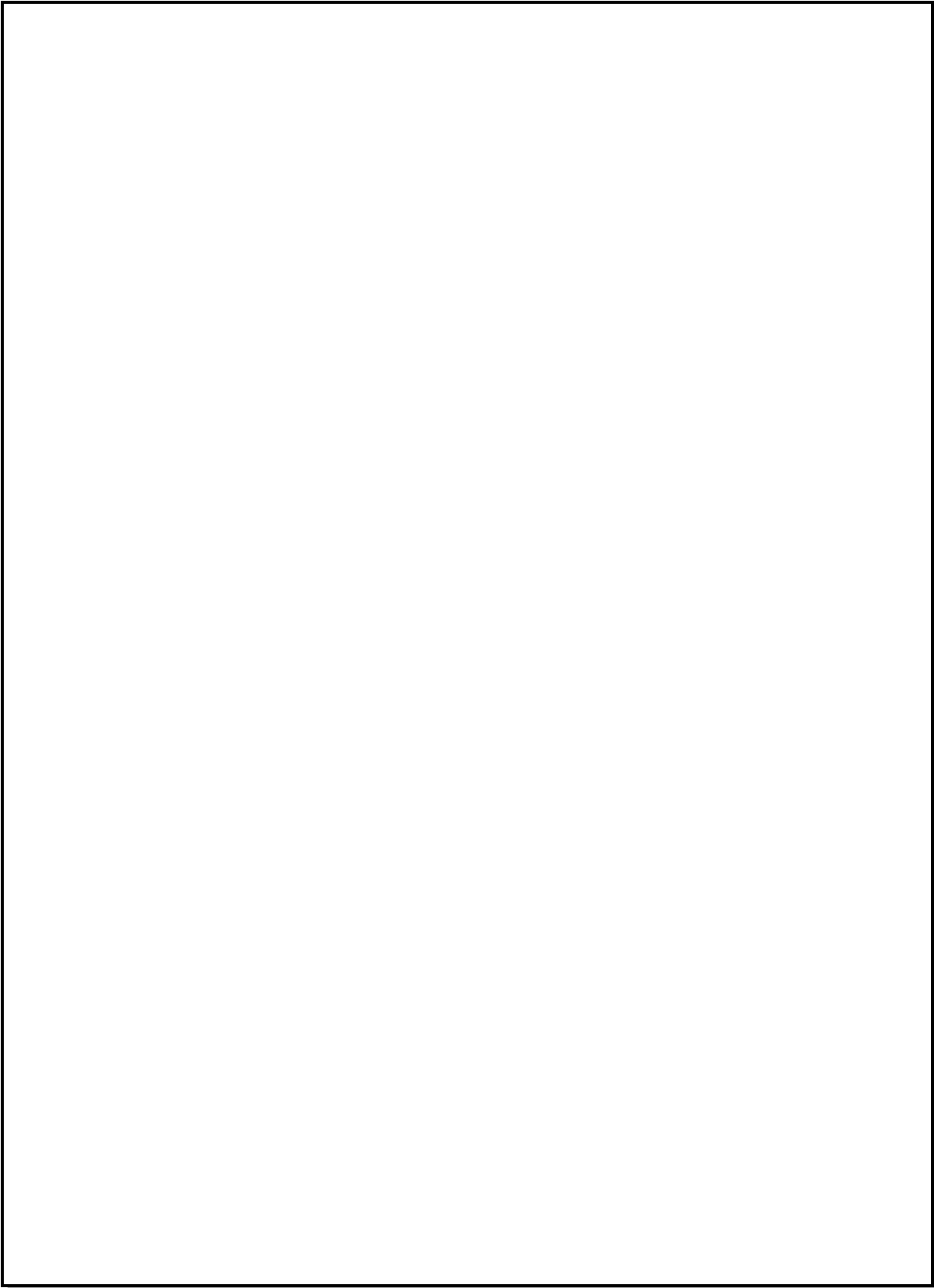
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

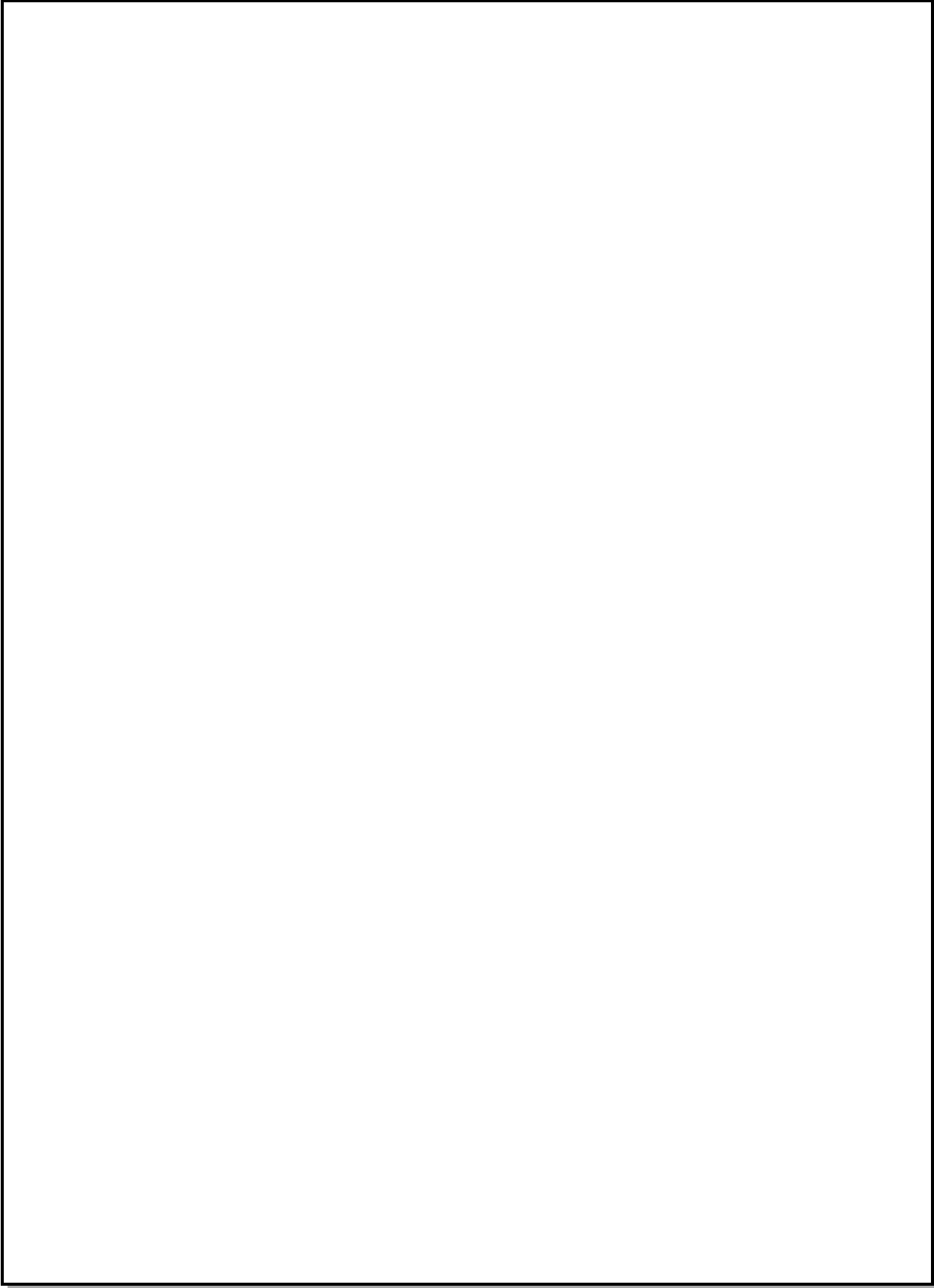
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

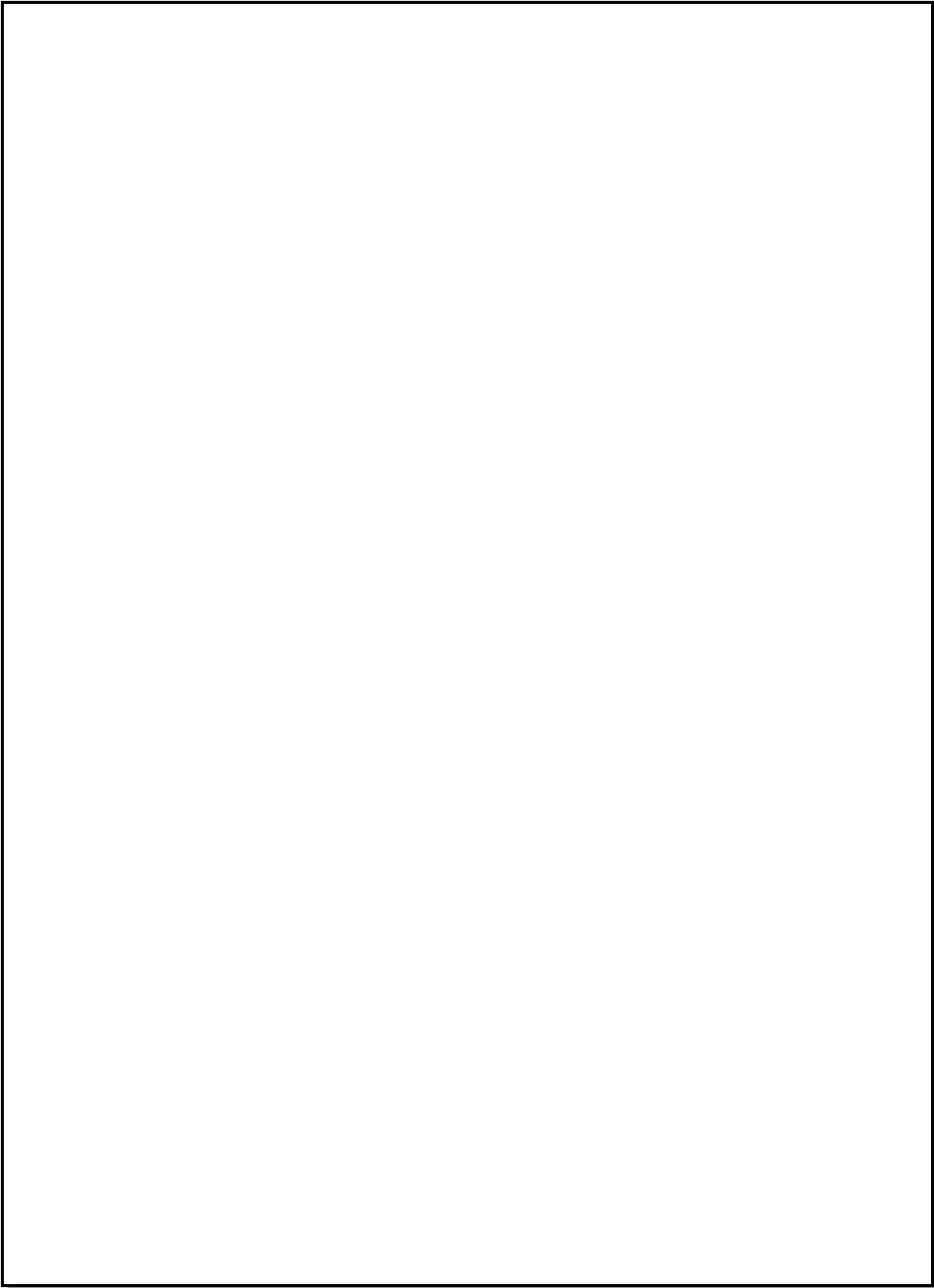
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

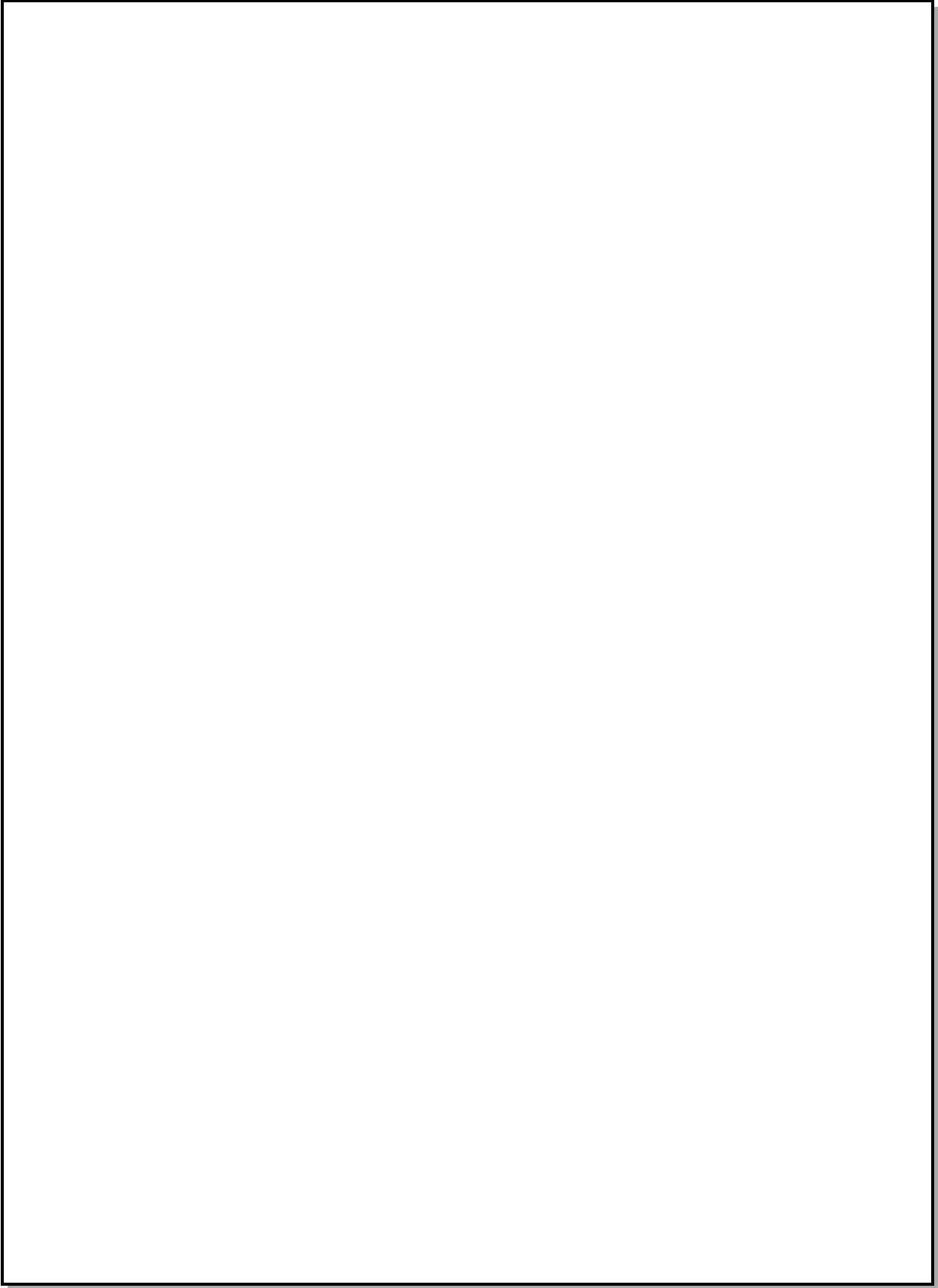
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

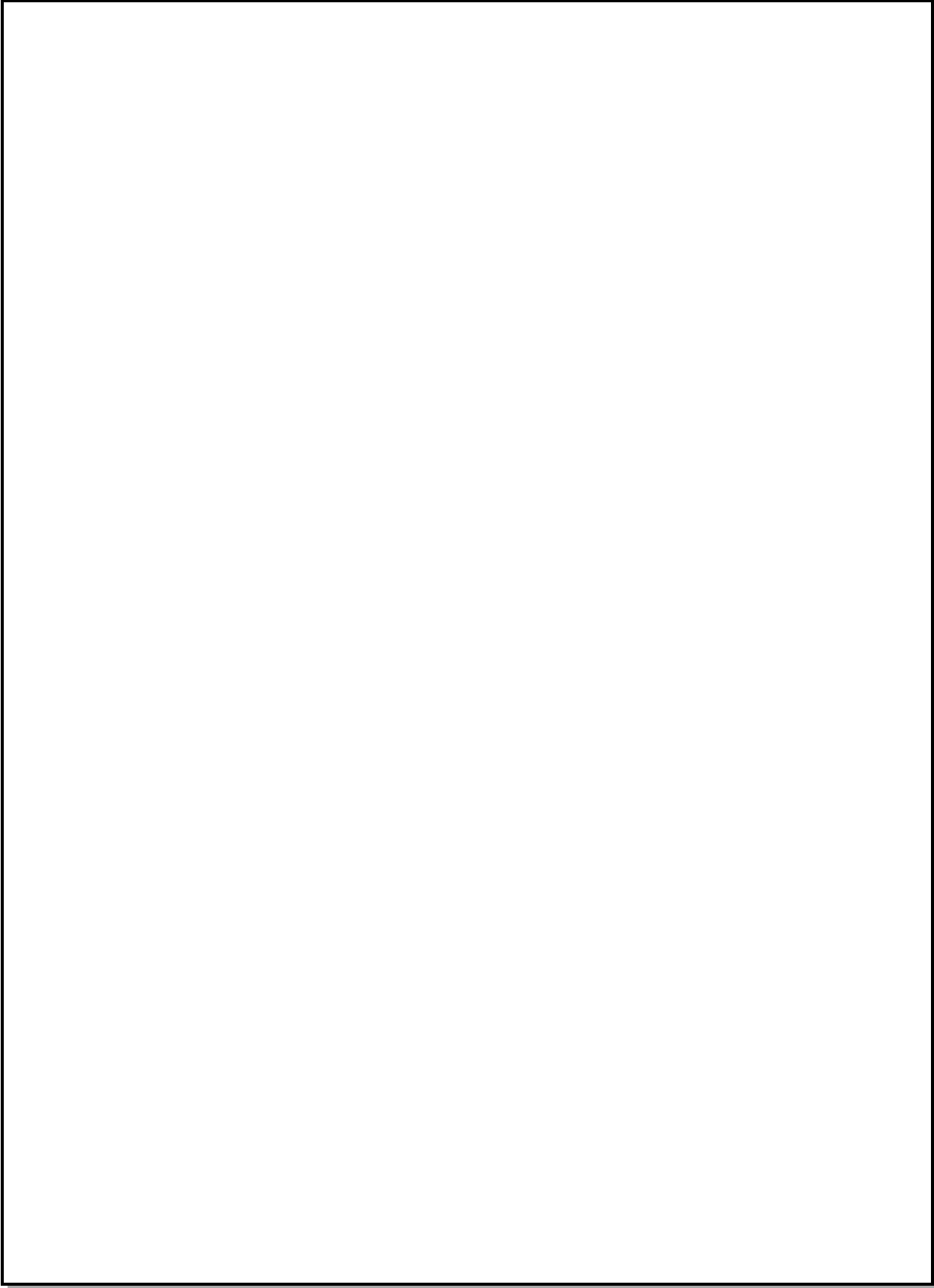
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

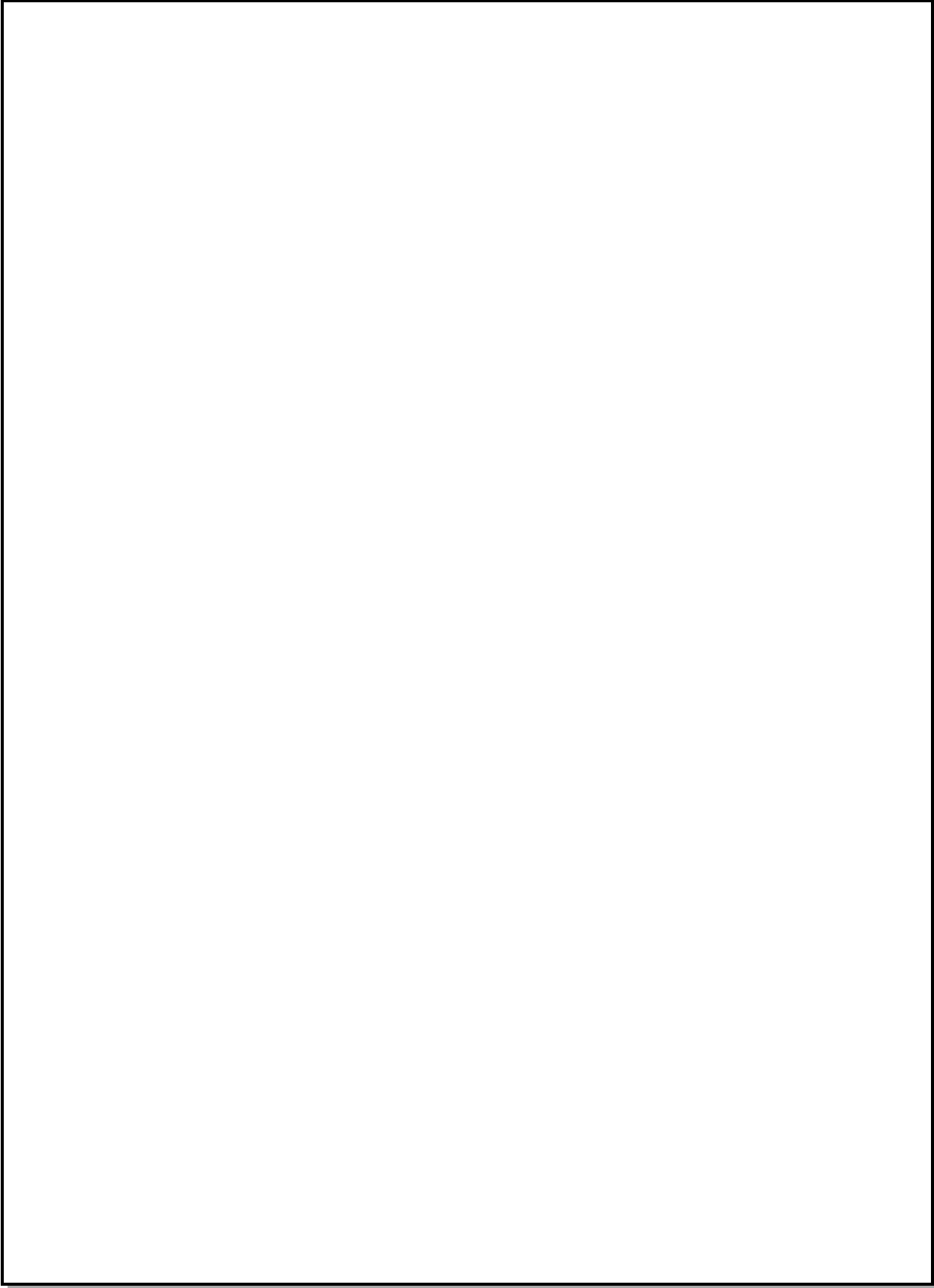
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

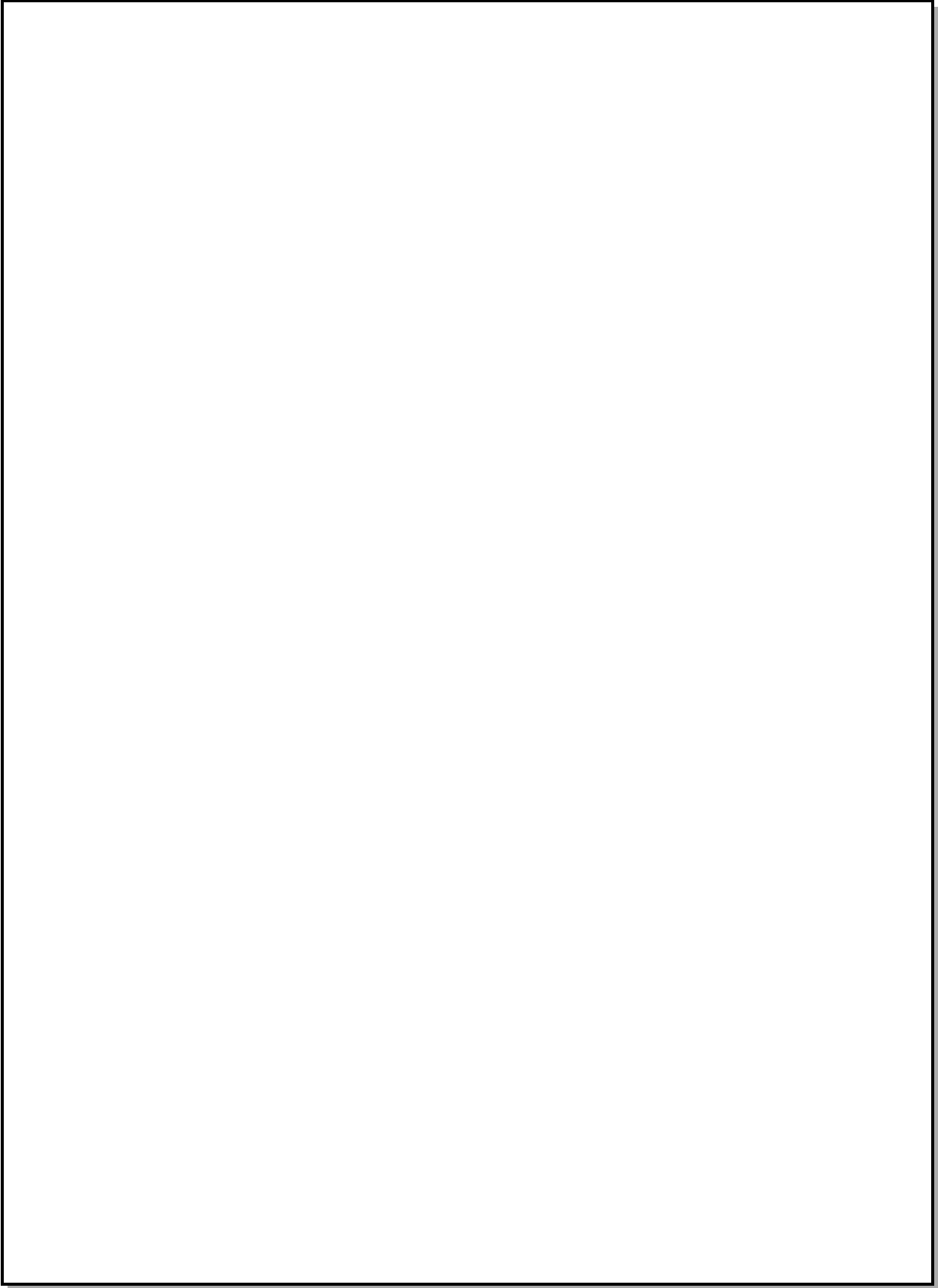
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

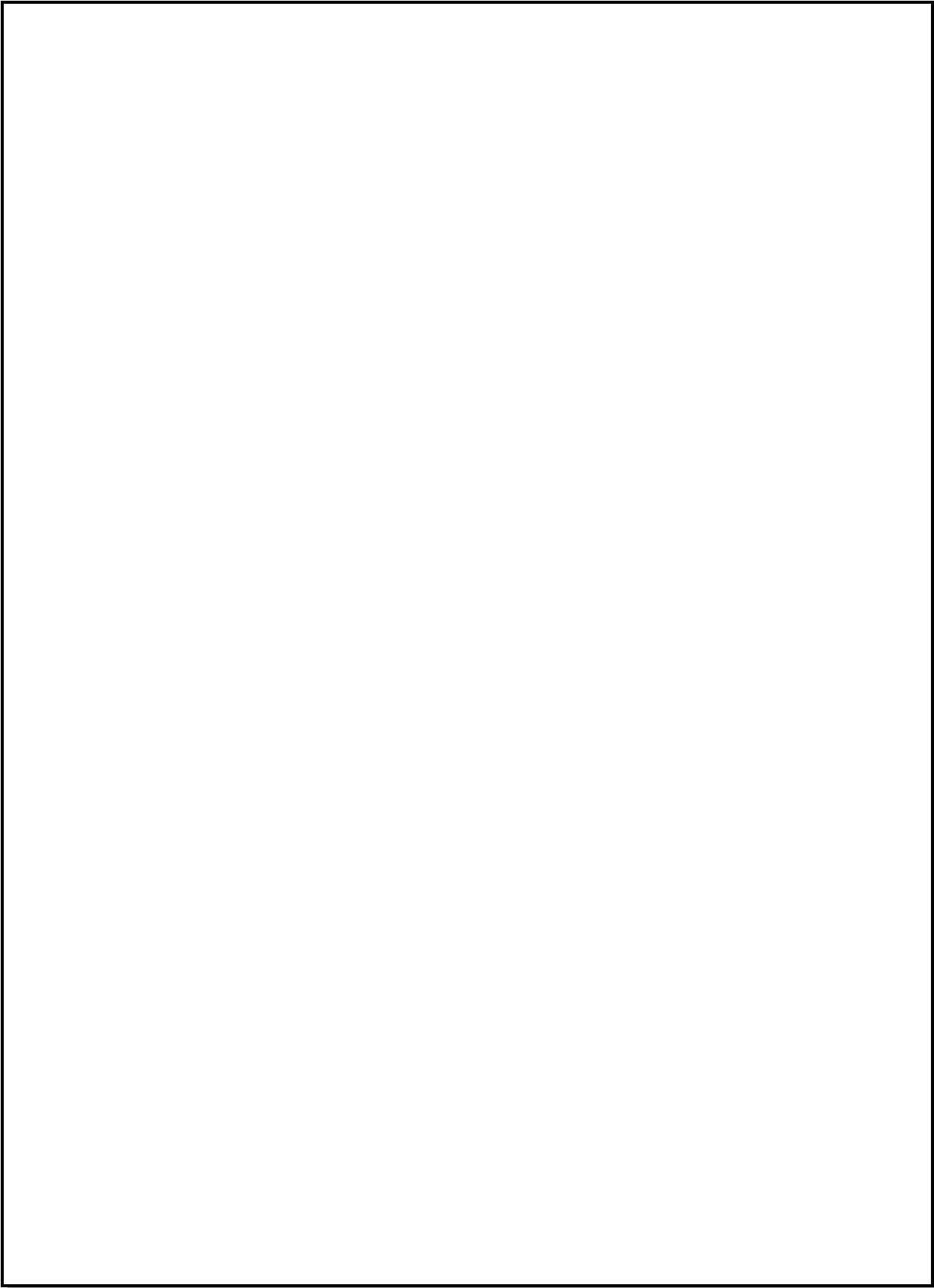
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

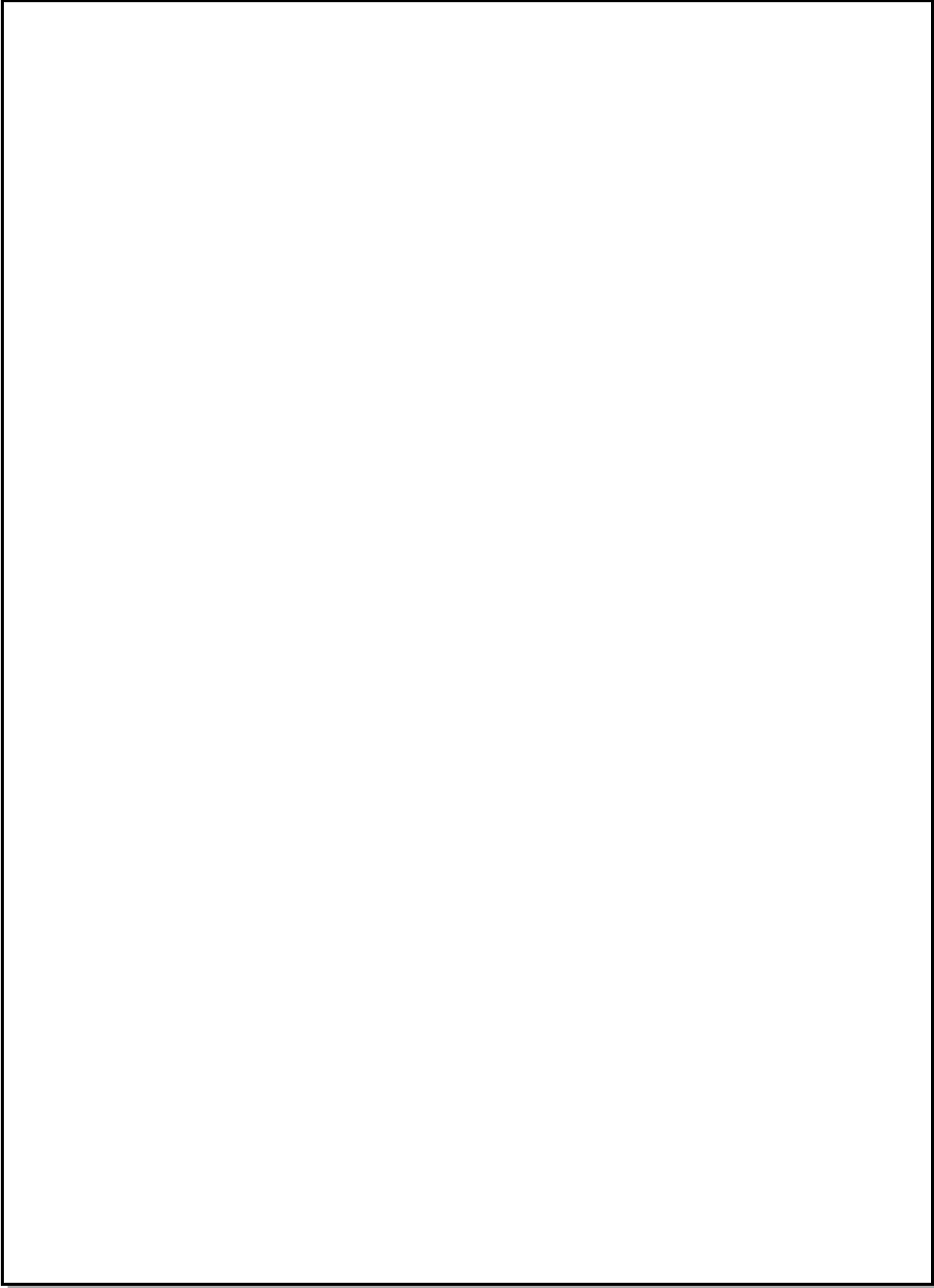
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

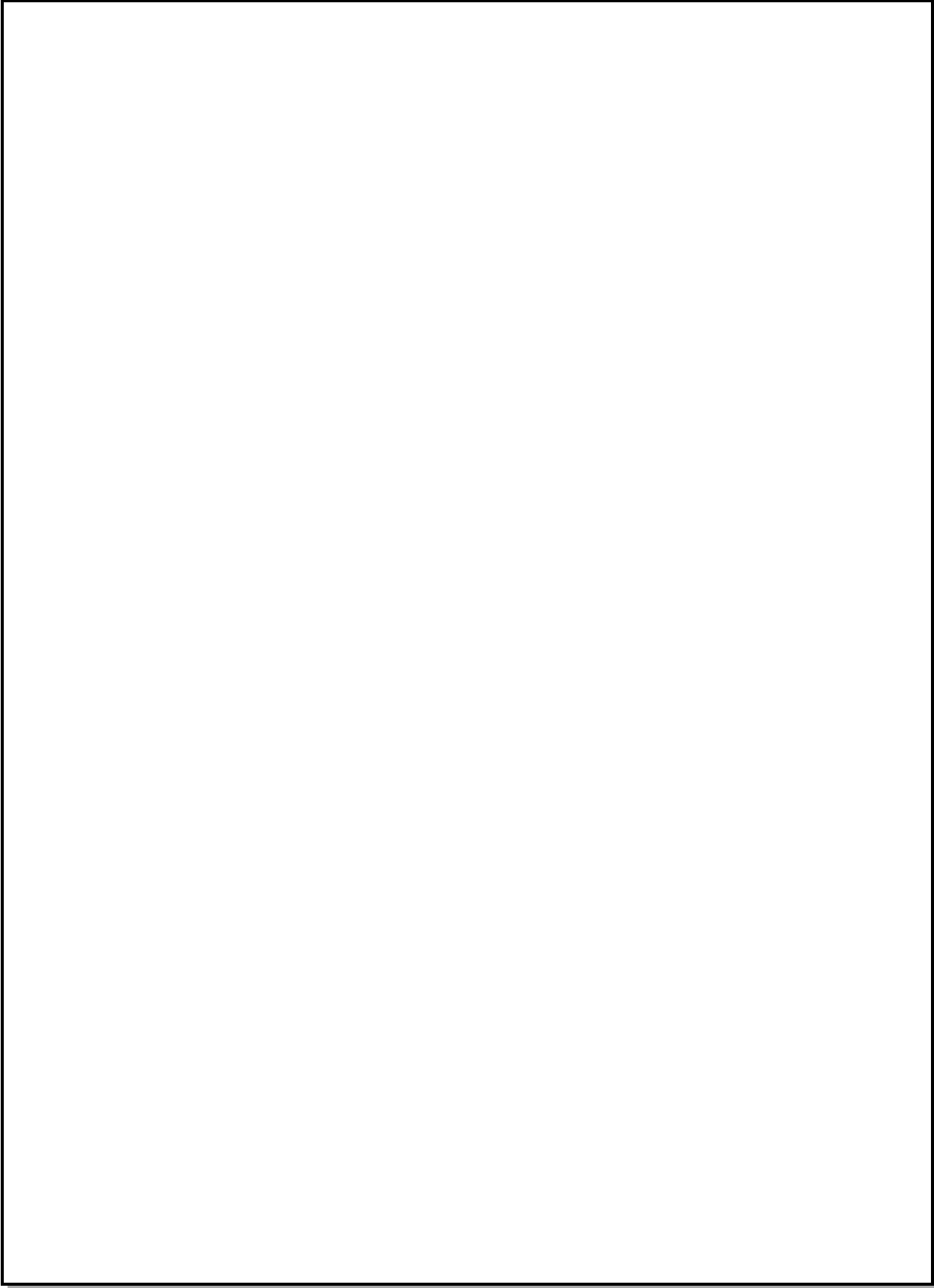
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

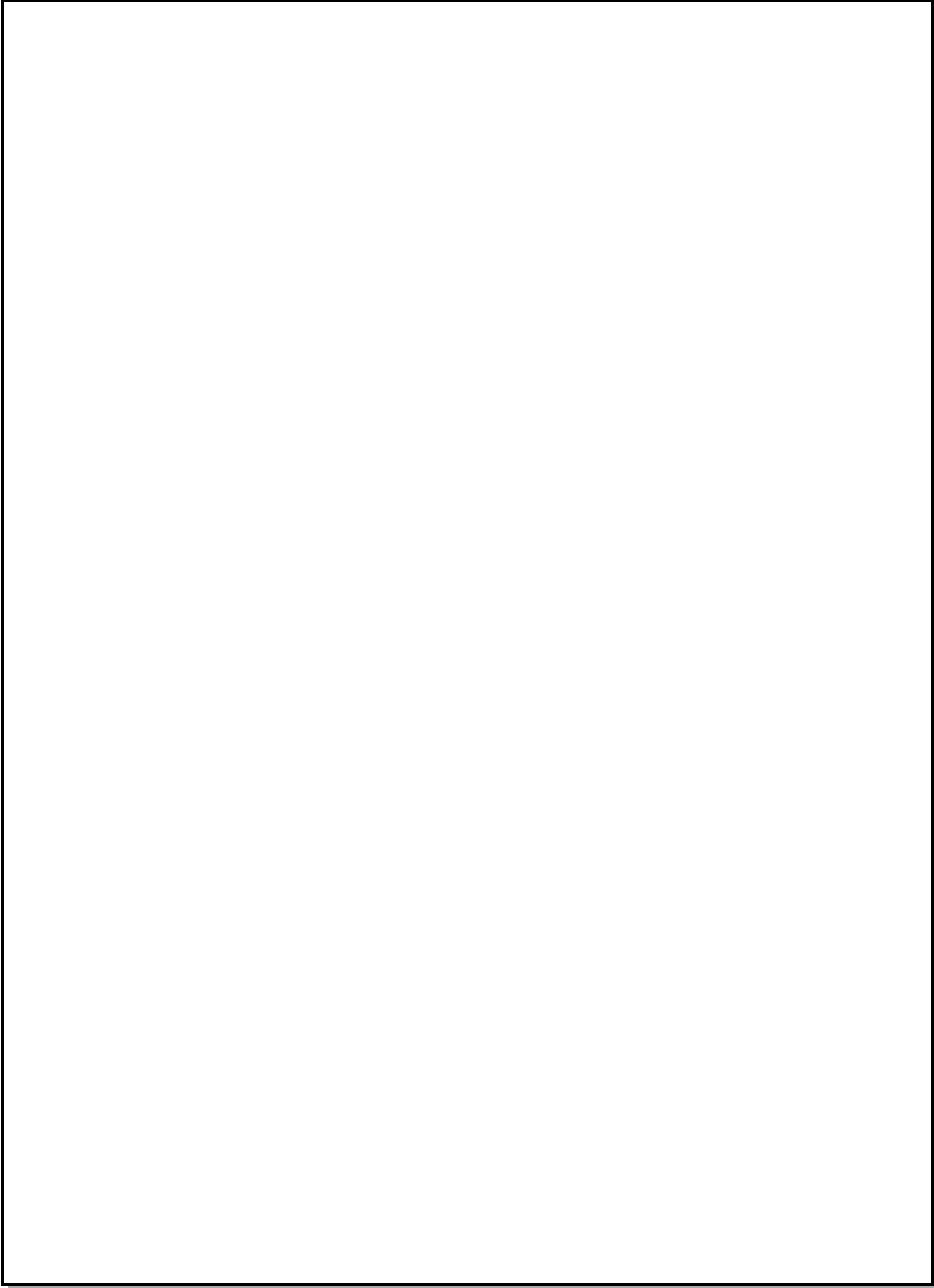
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

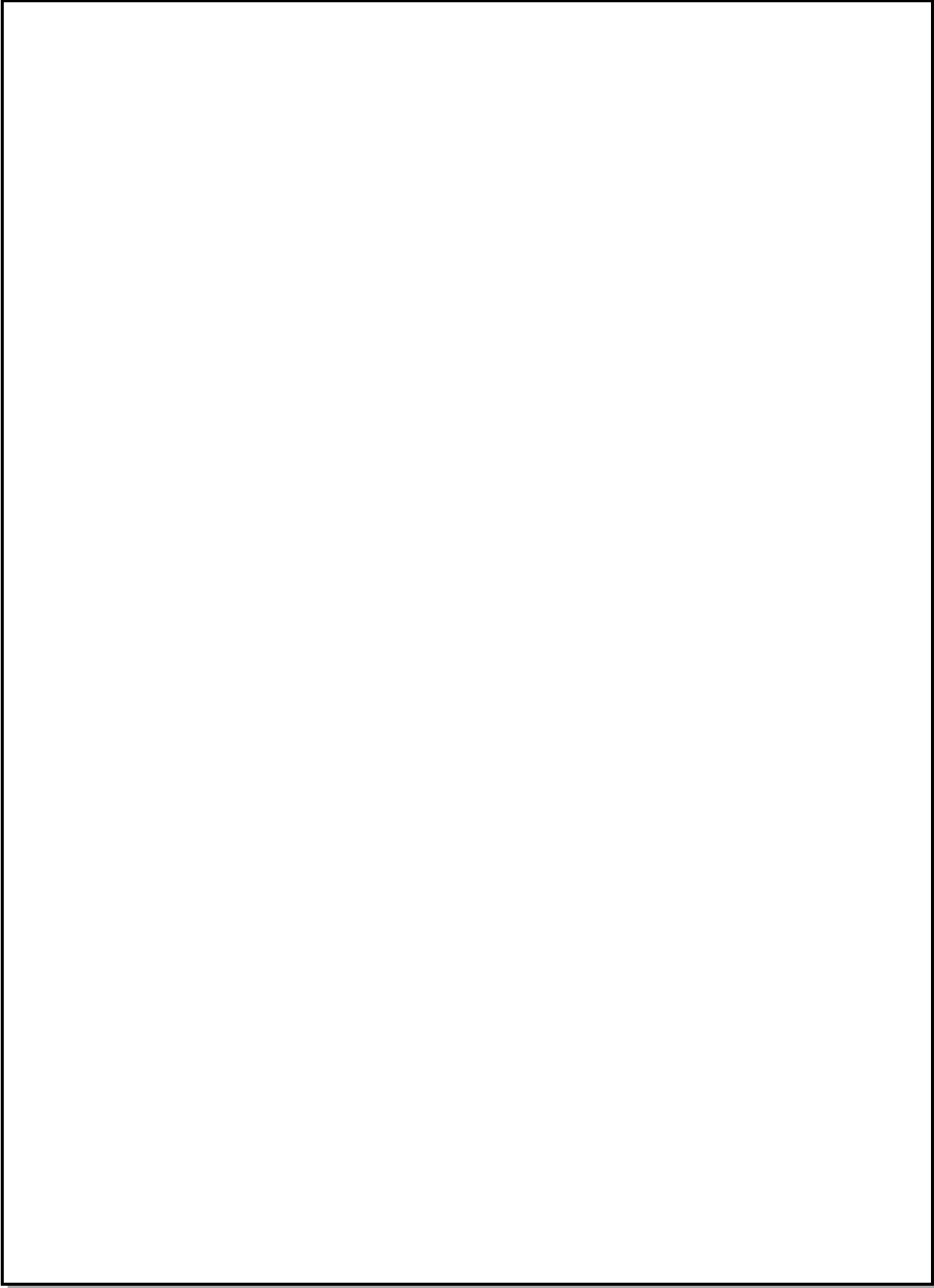
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

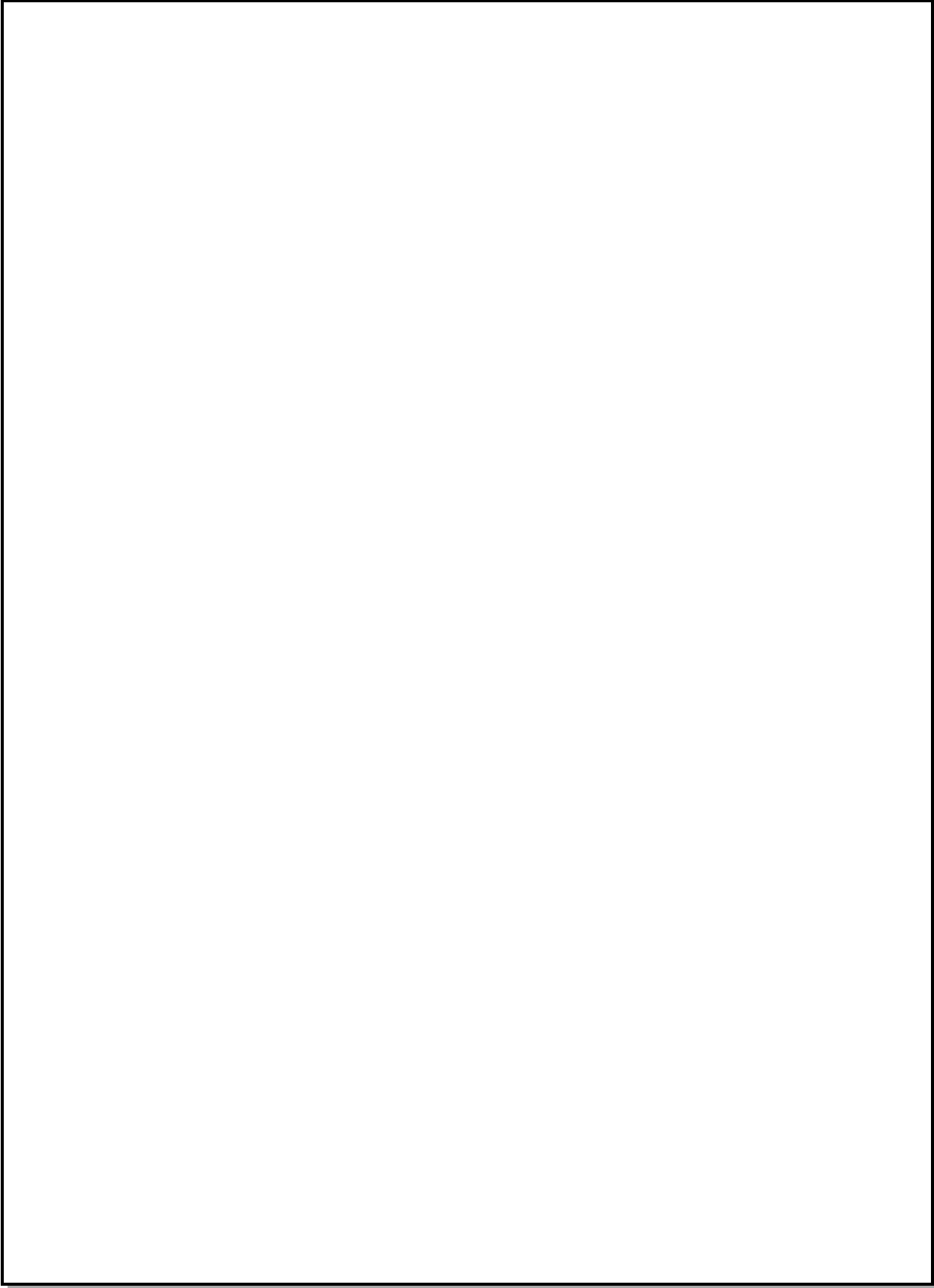
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

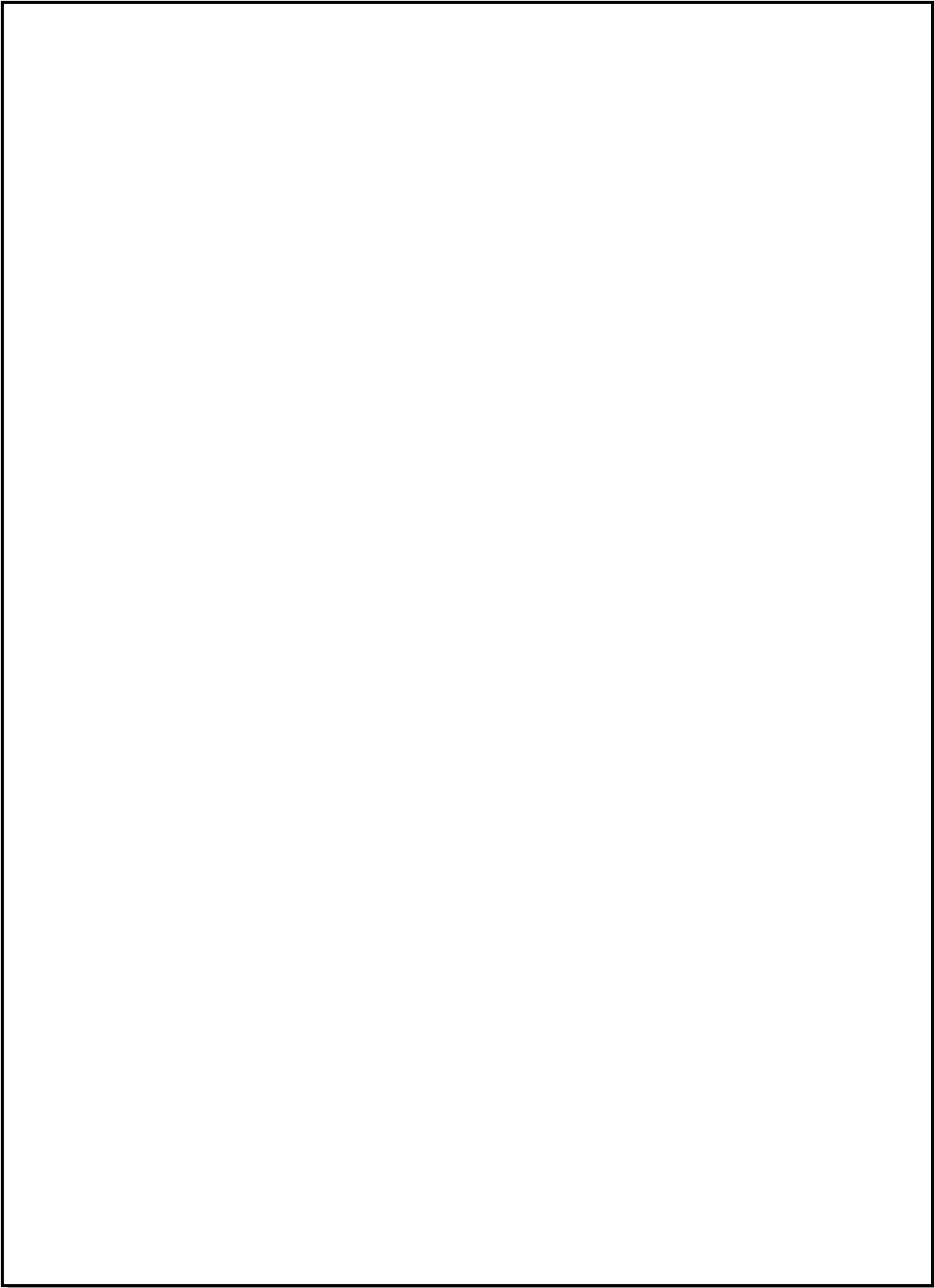
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

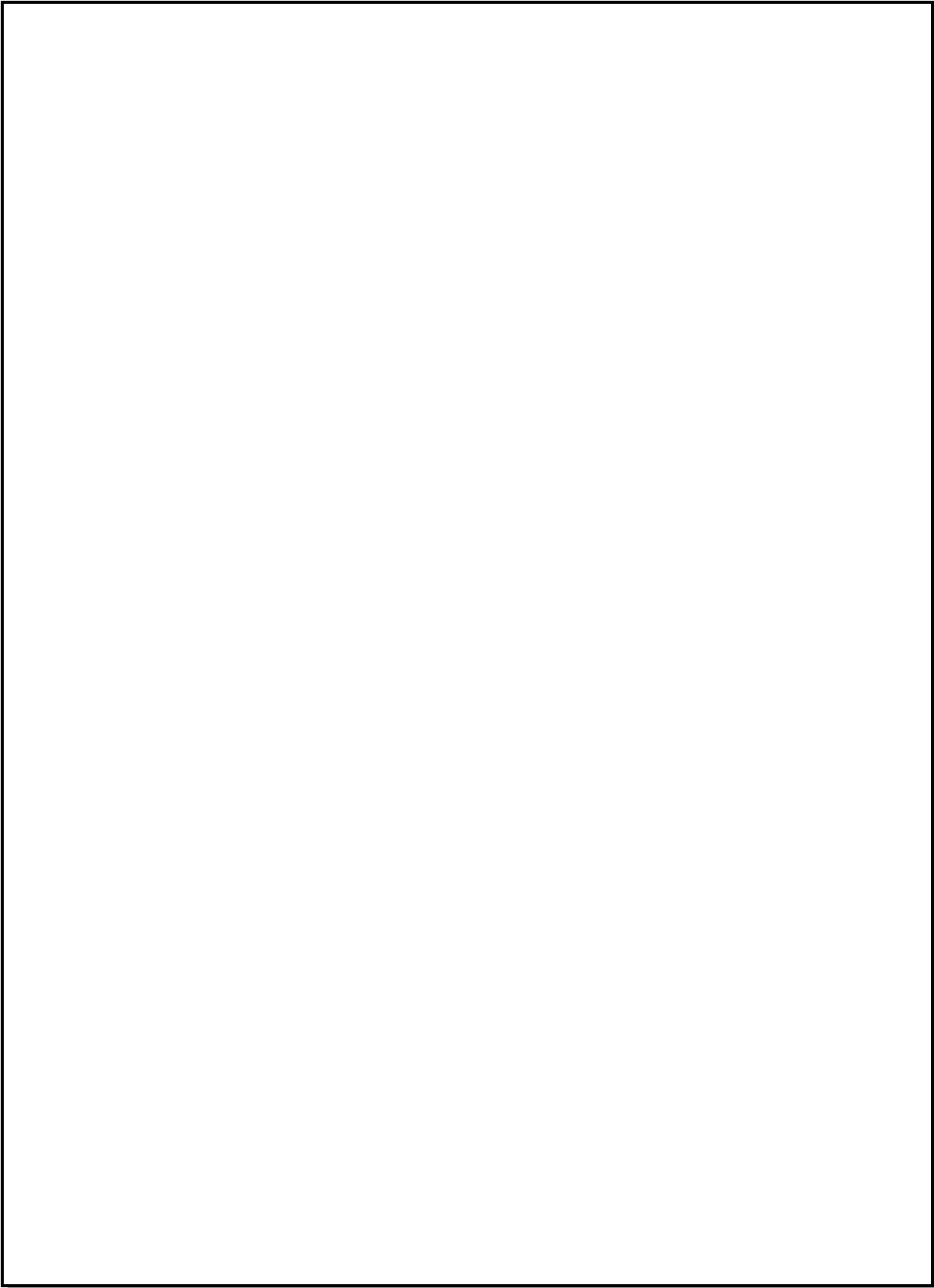
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

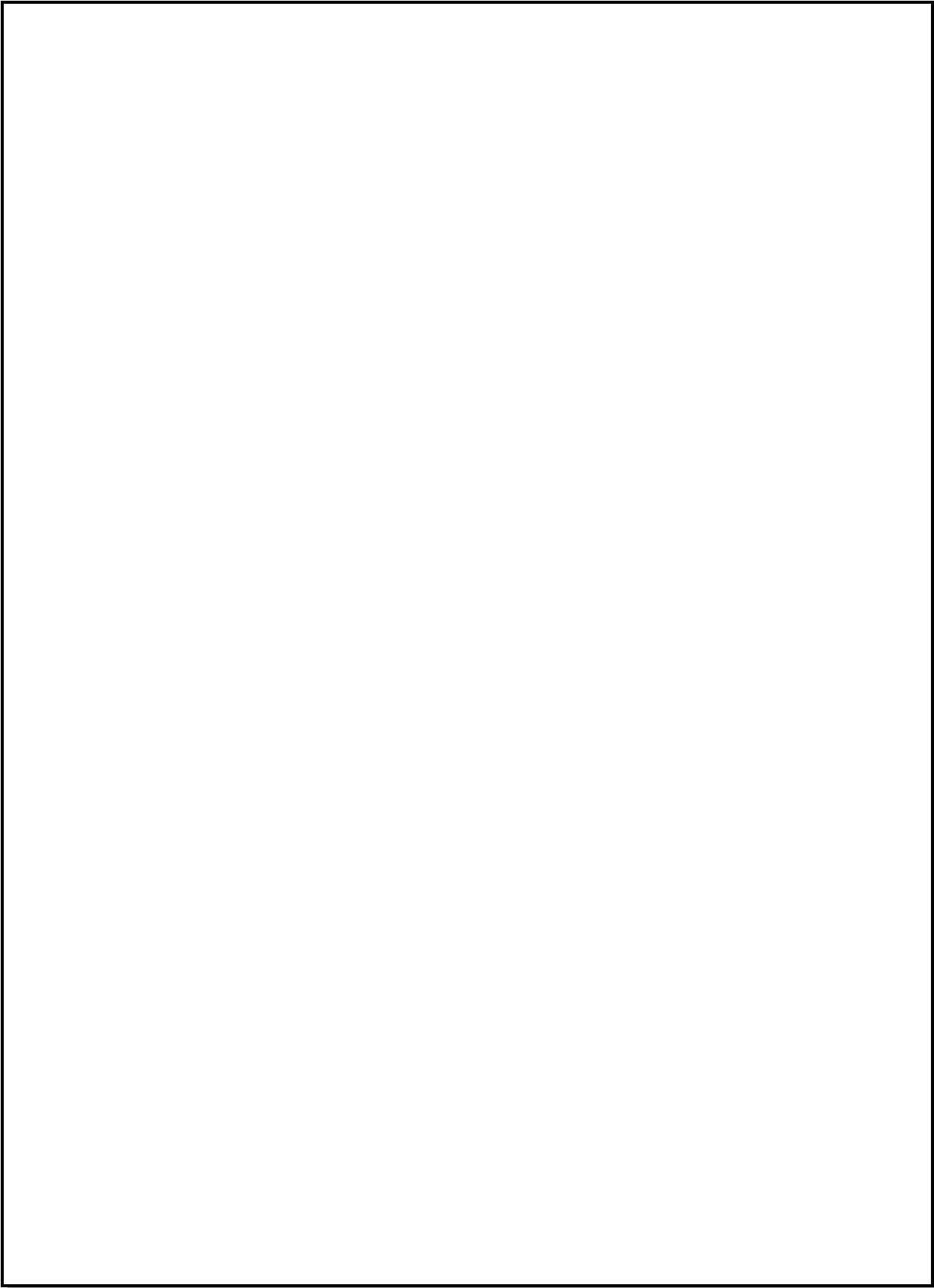
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

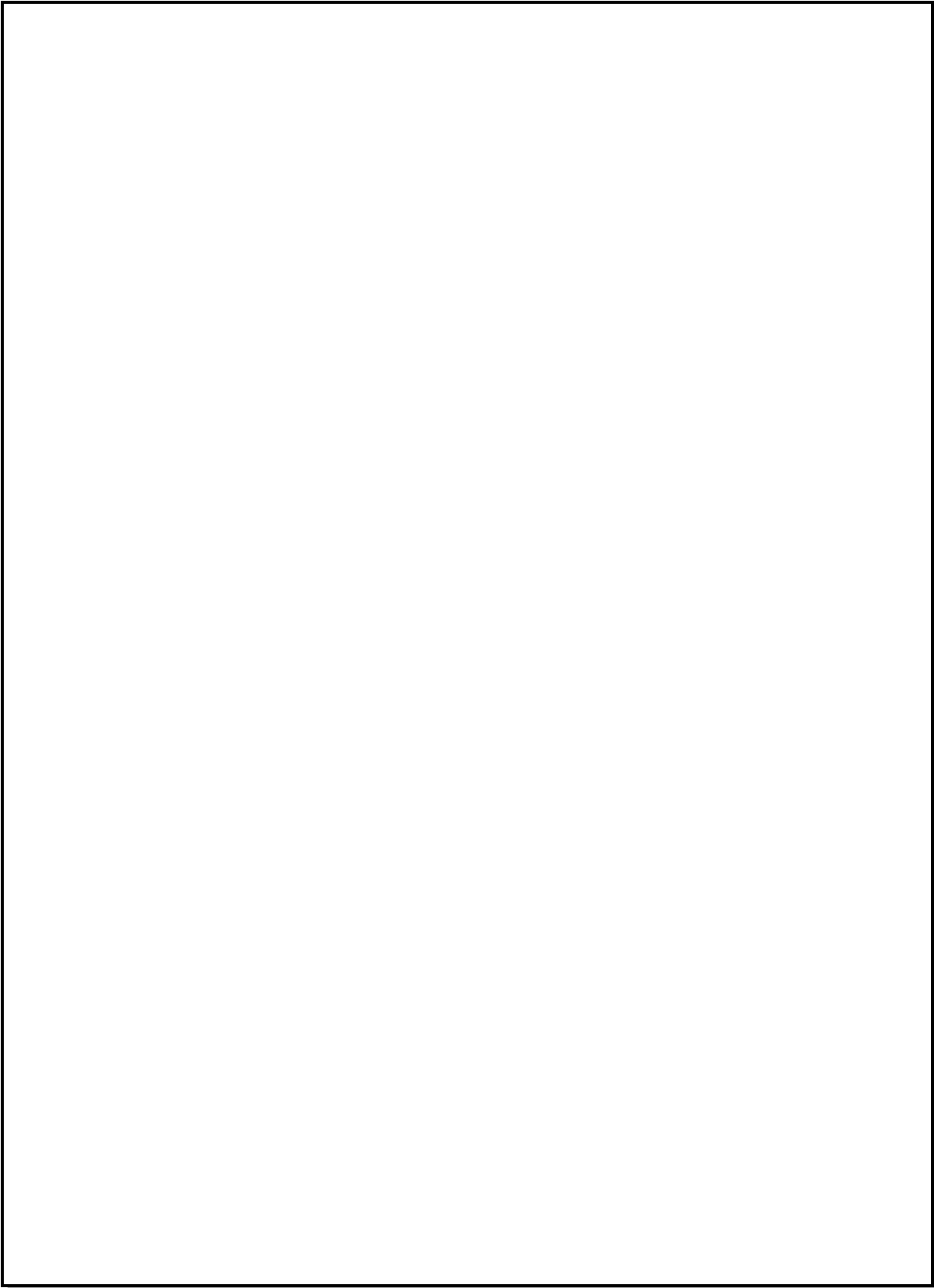
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

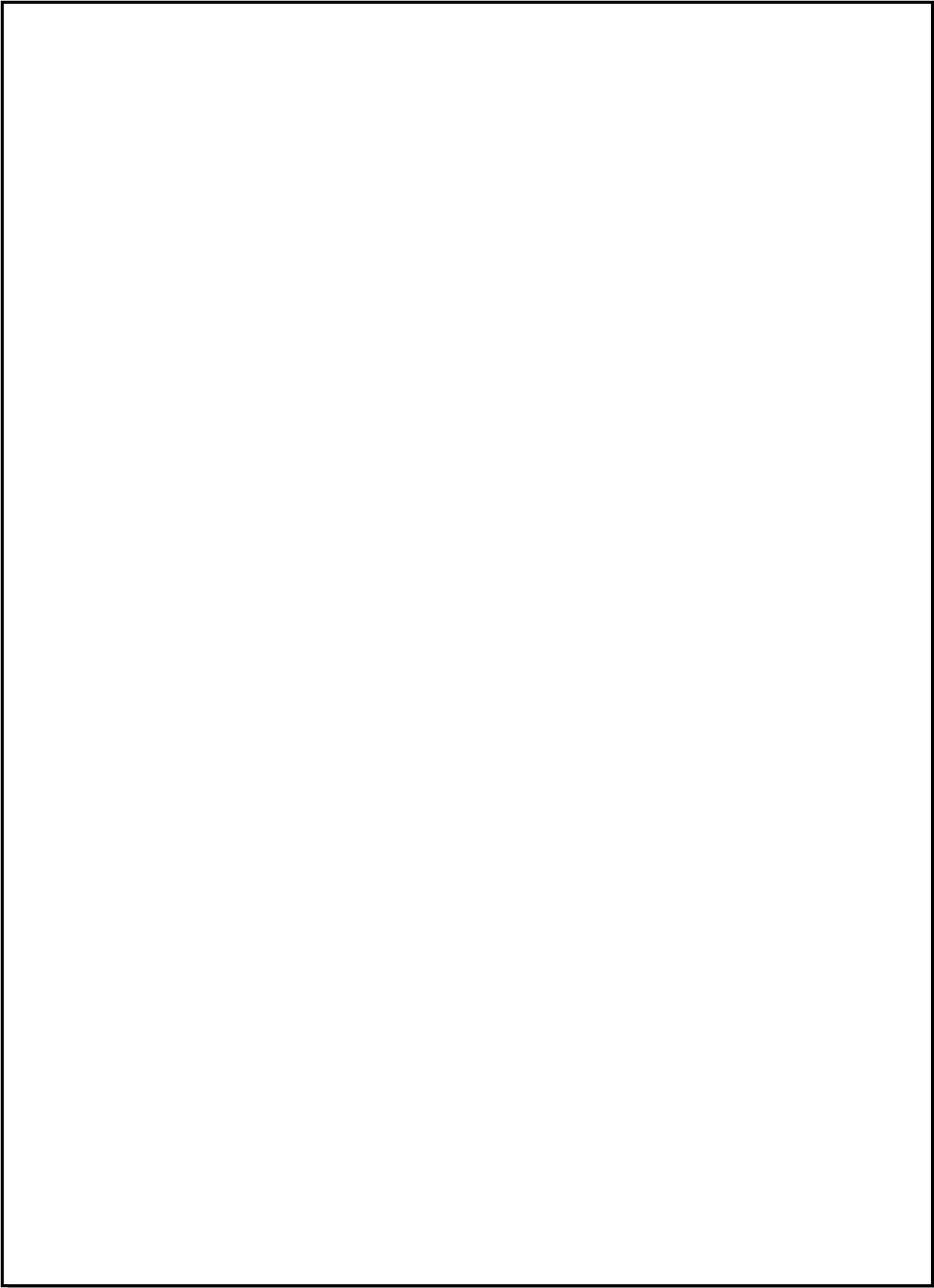


CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

227

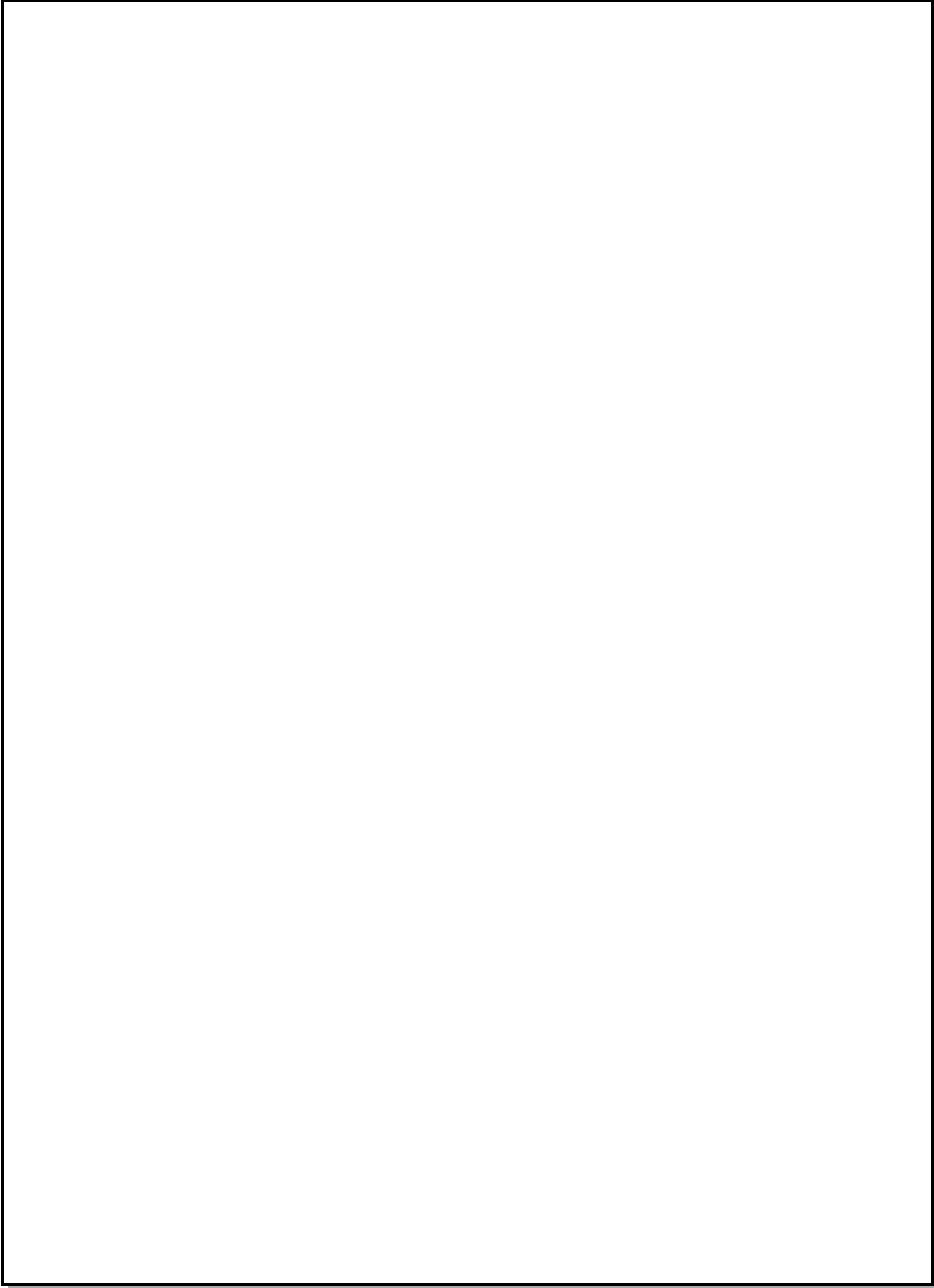
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

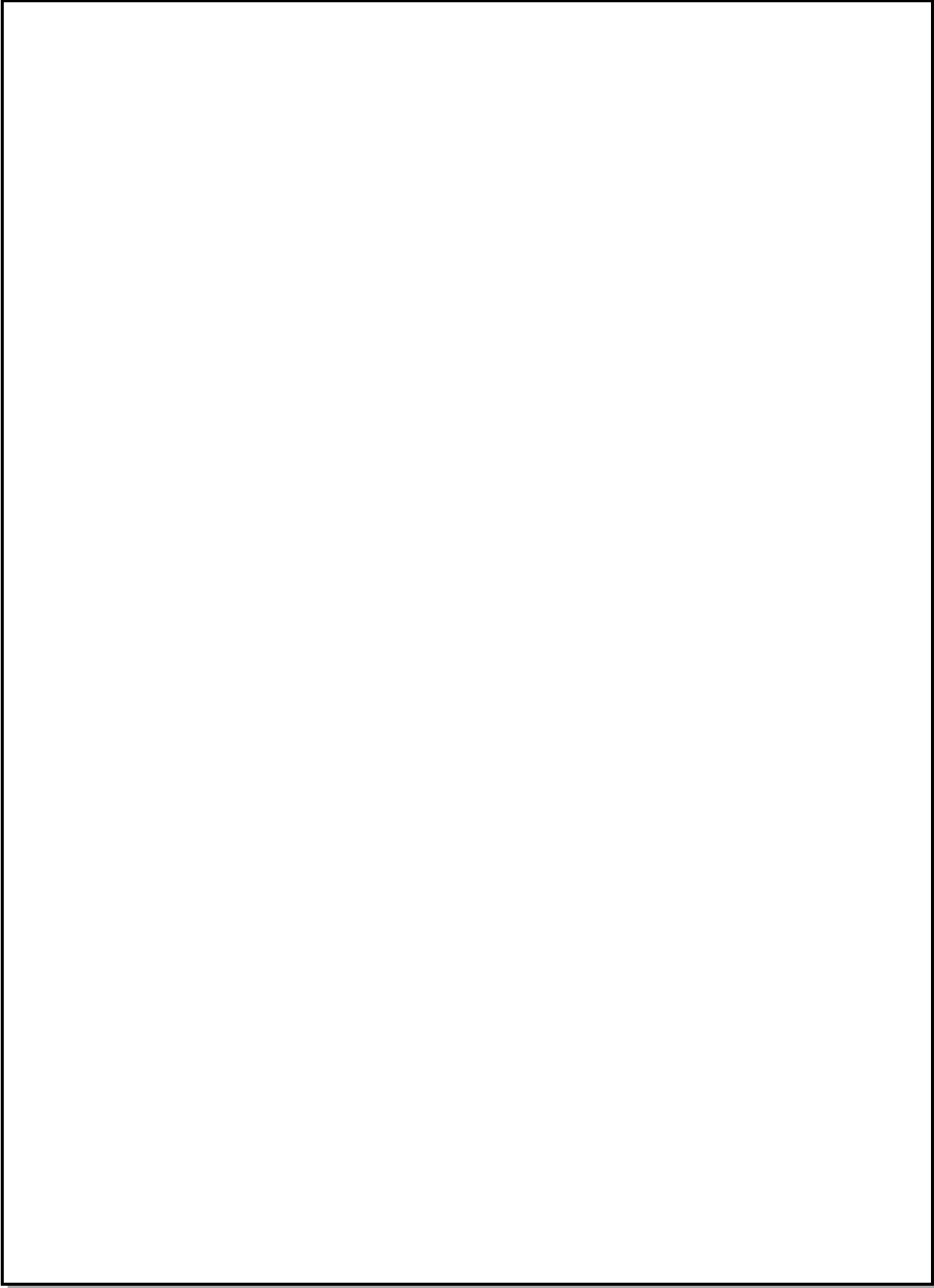
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

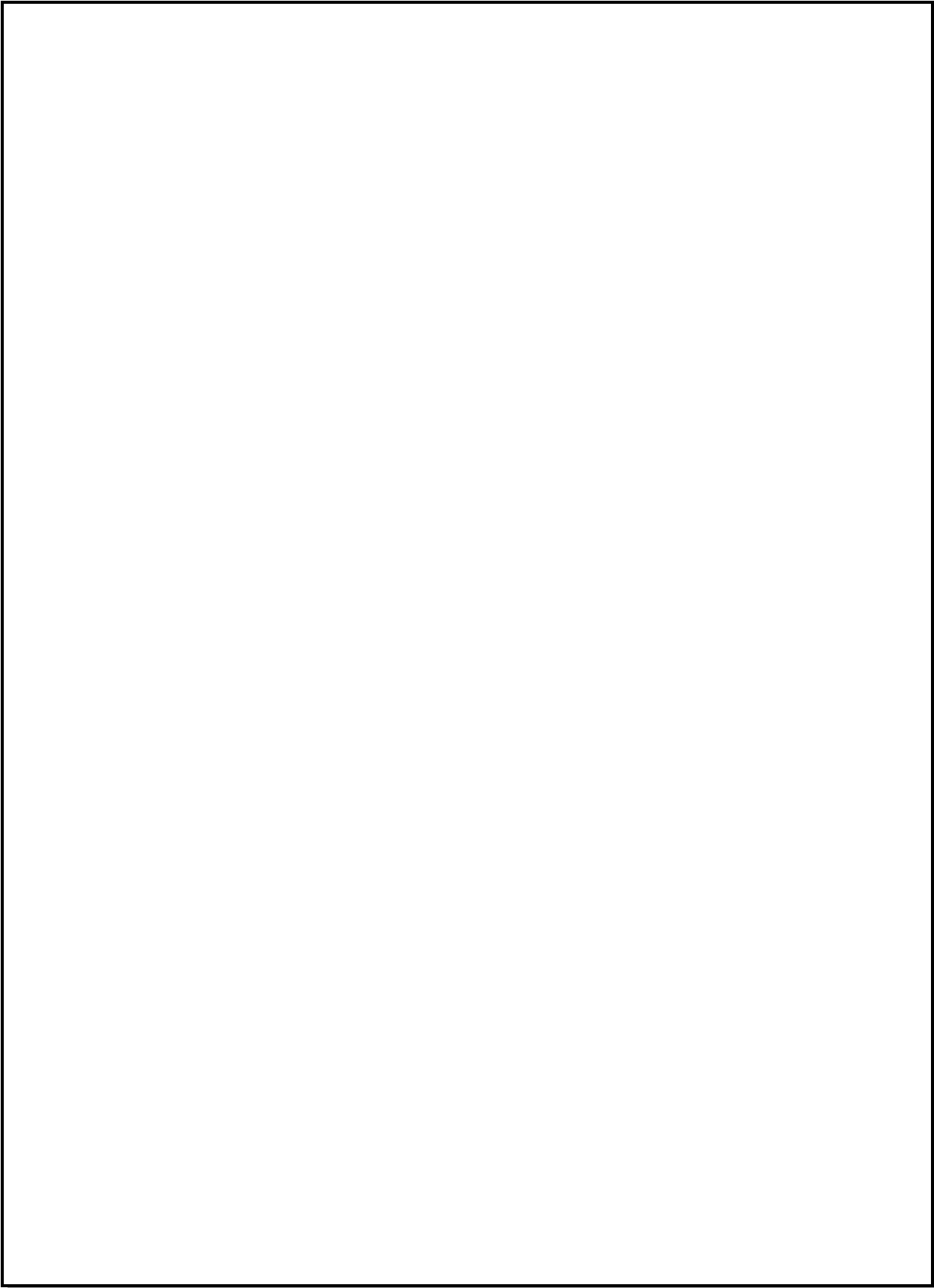
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

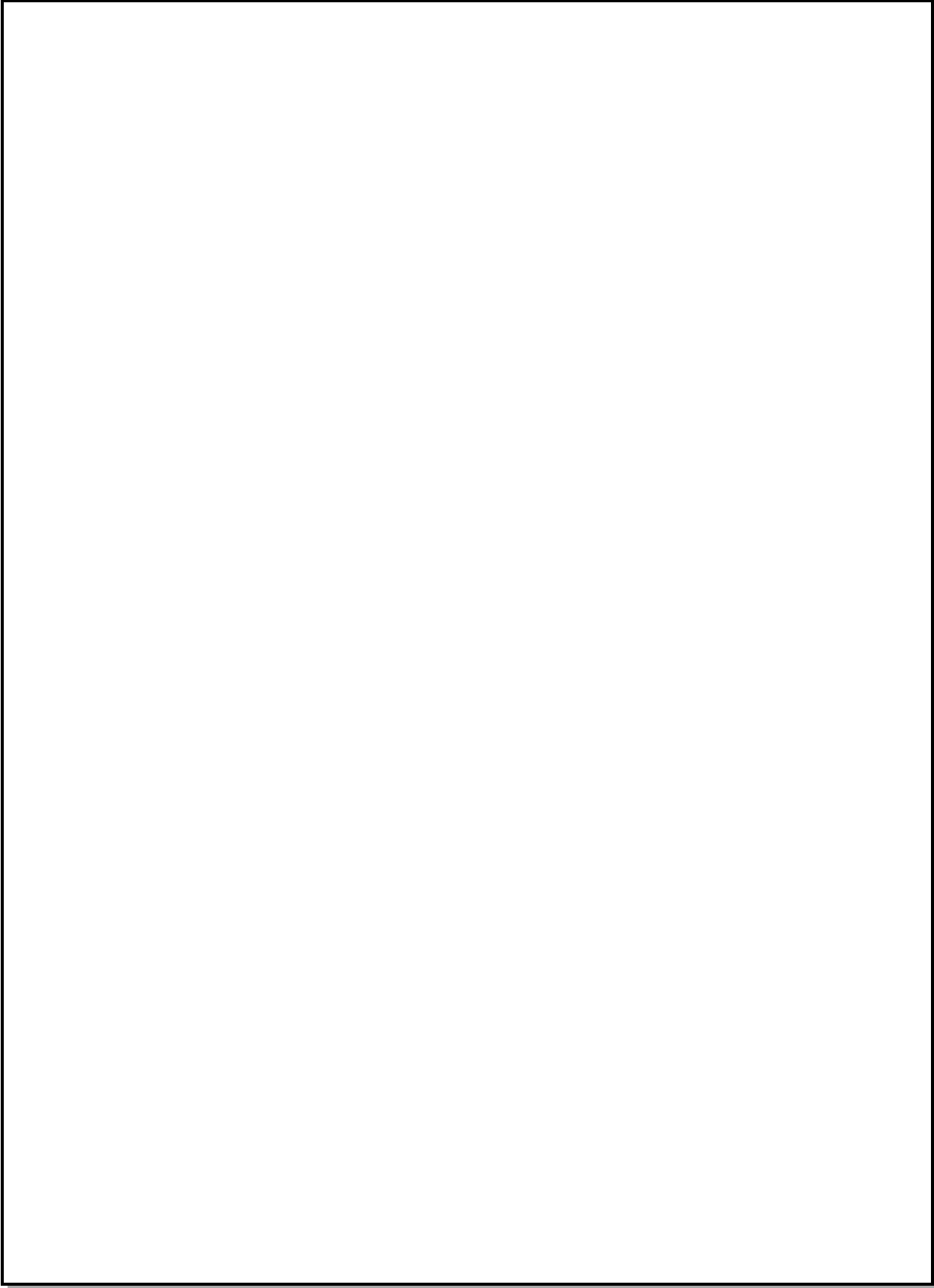
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

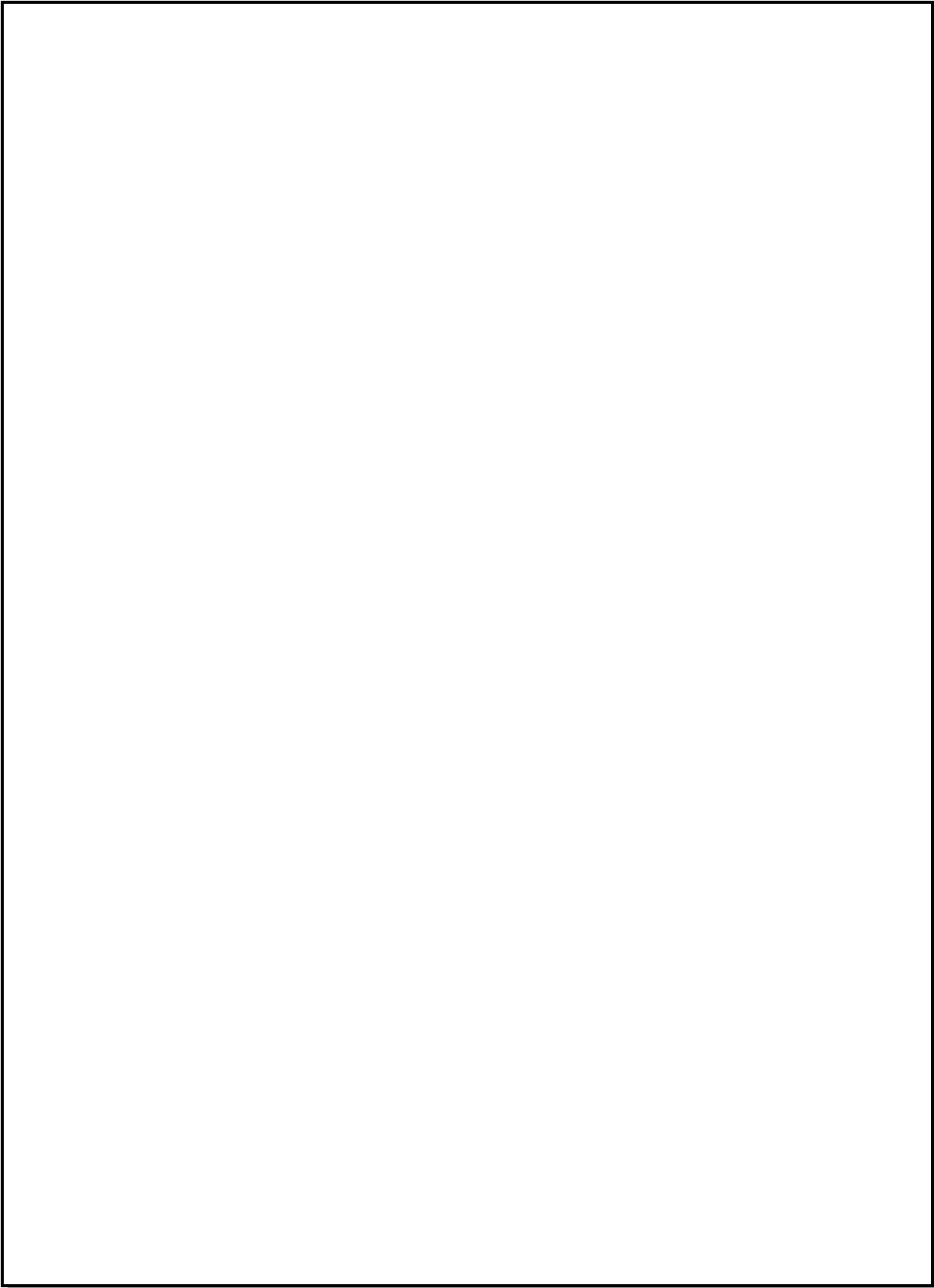
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

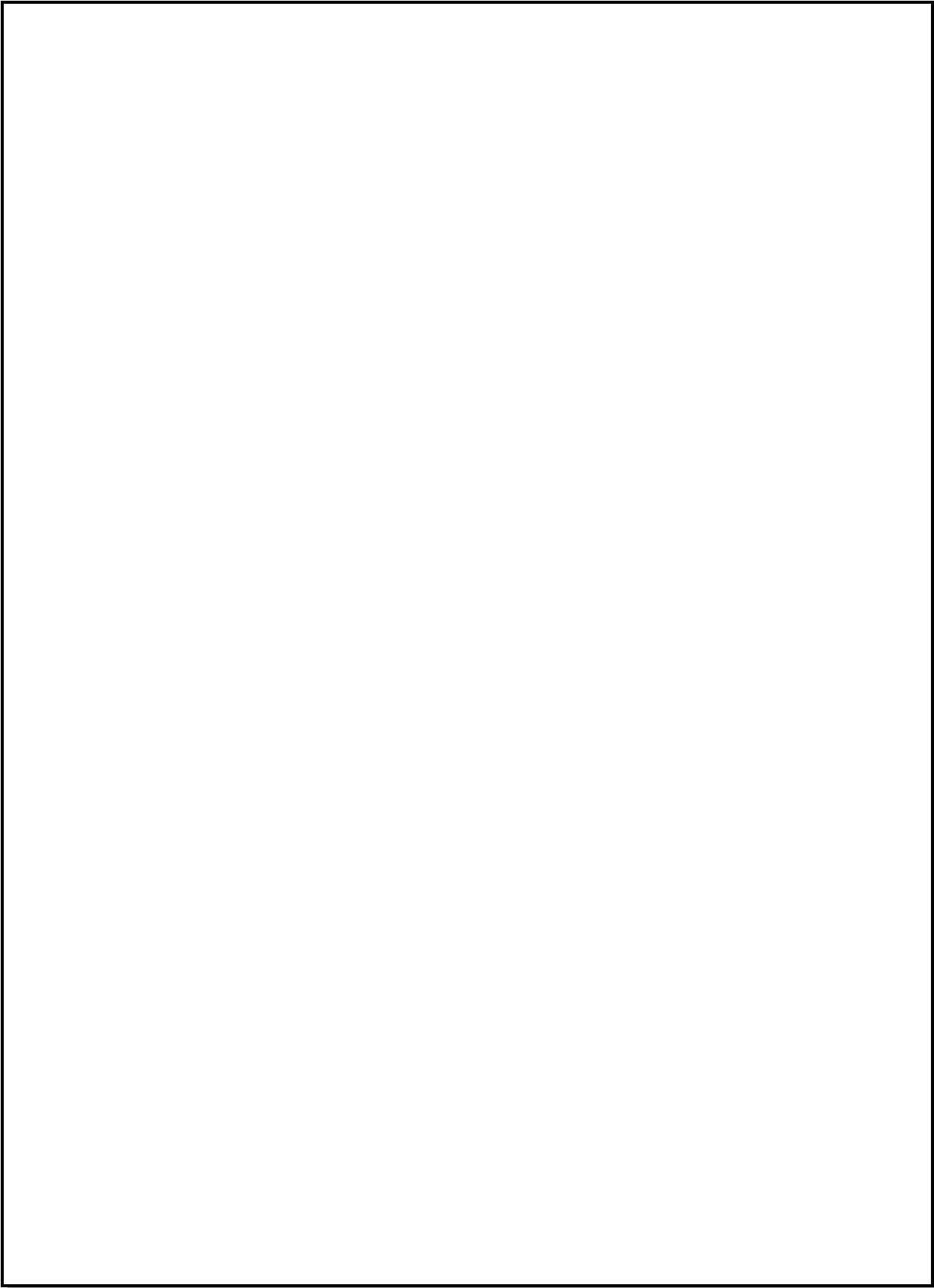
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

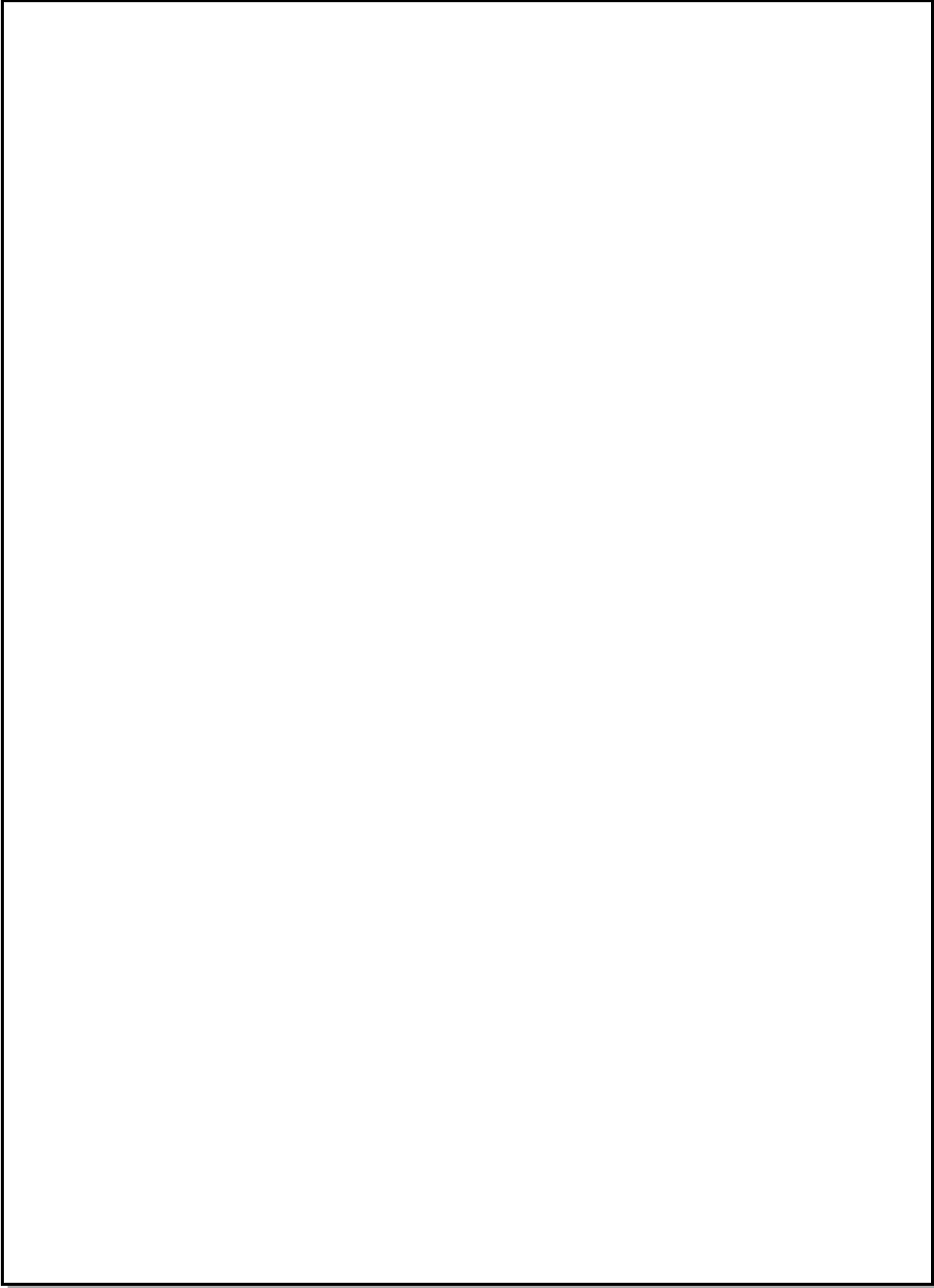
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

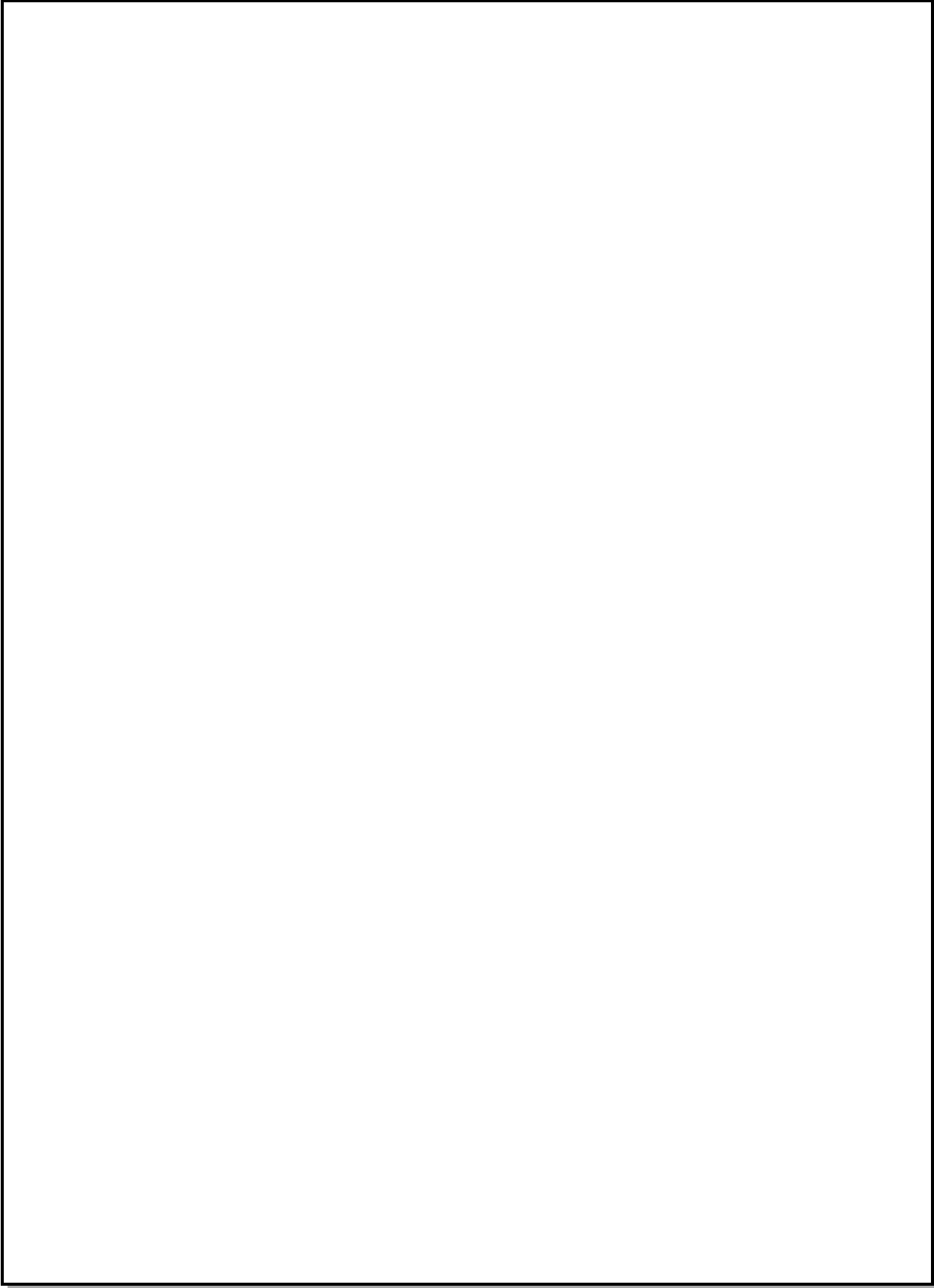
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

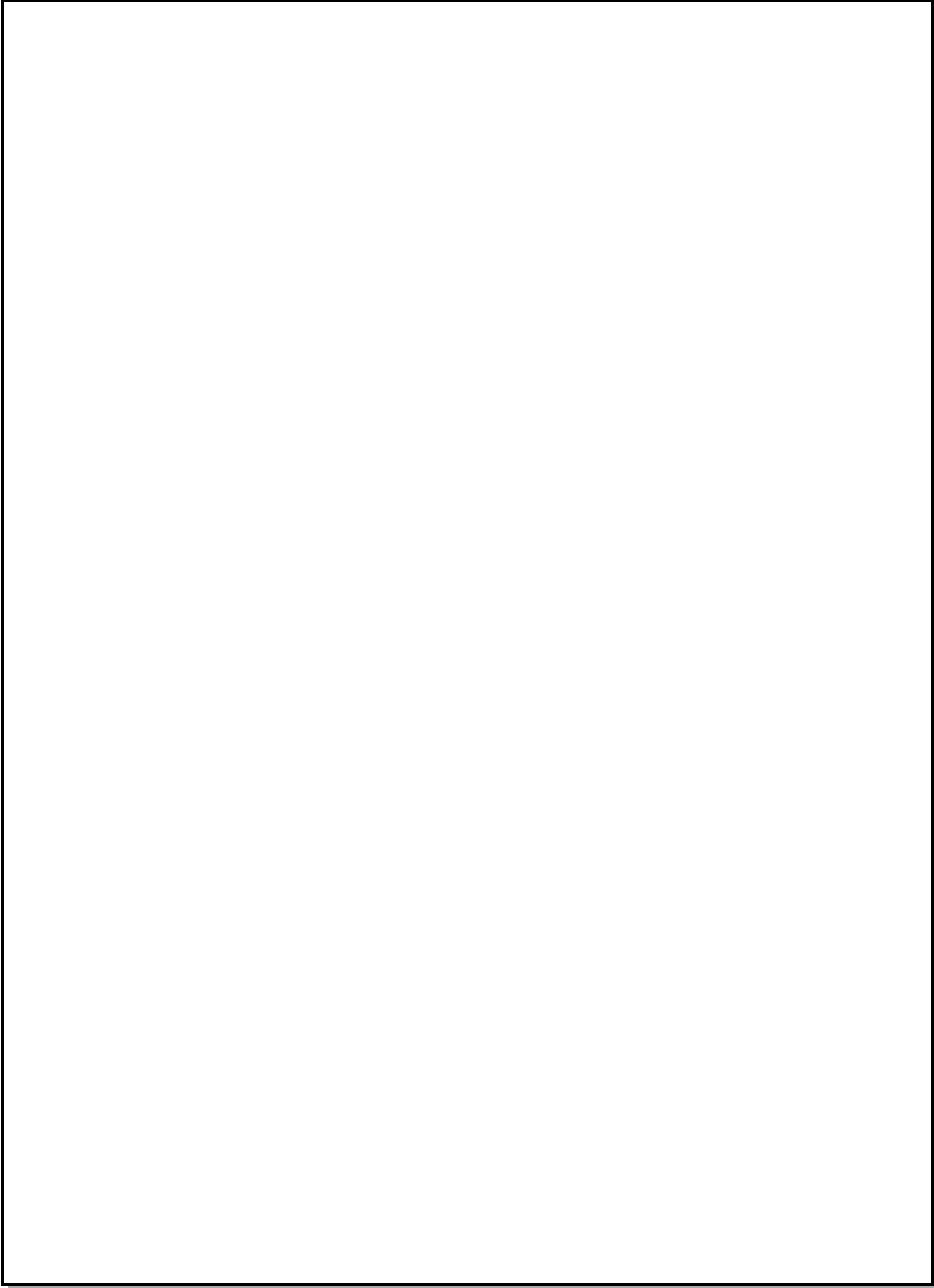
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

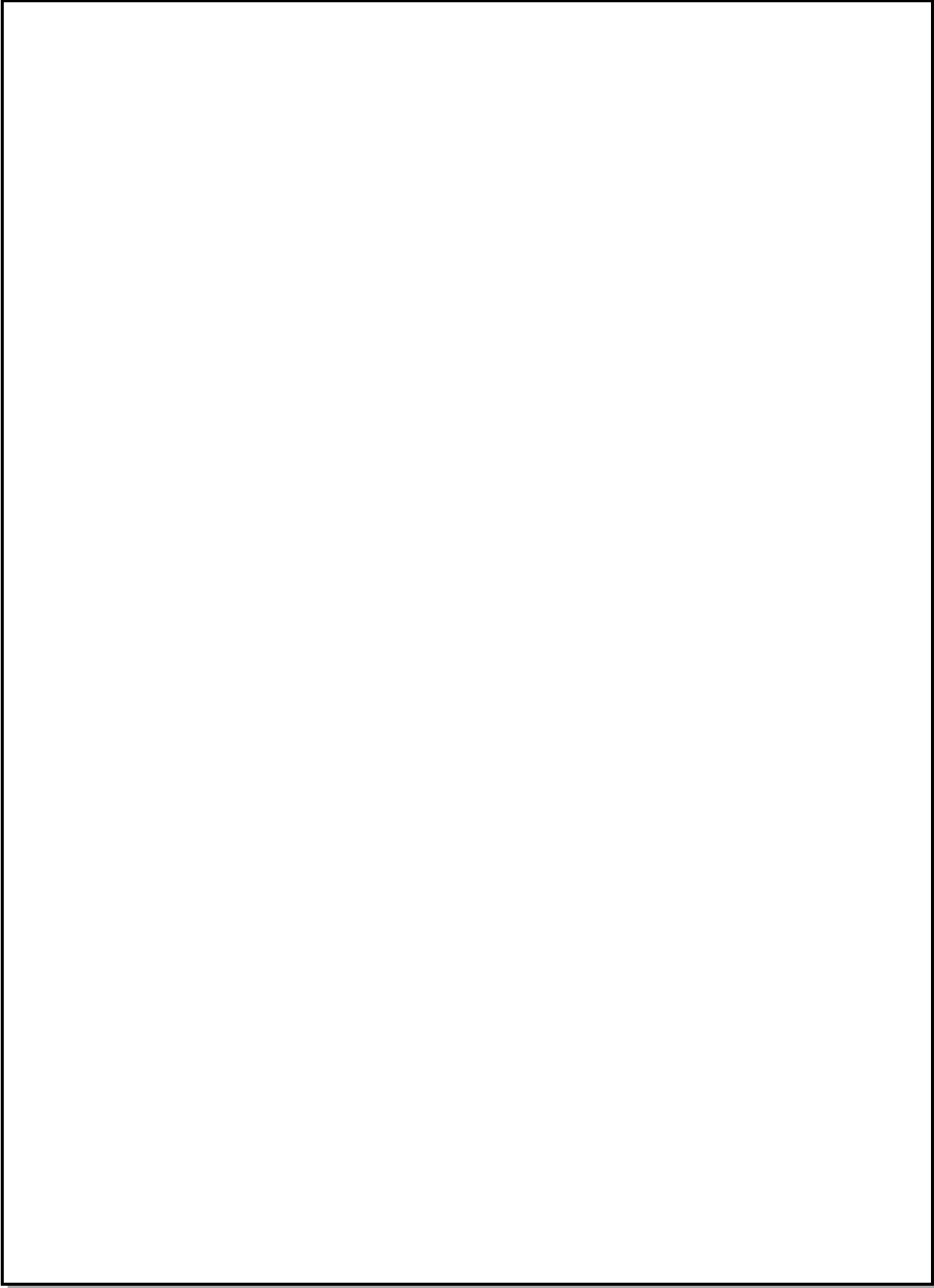
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

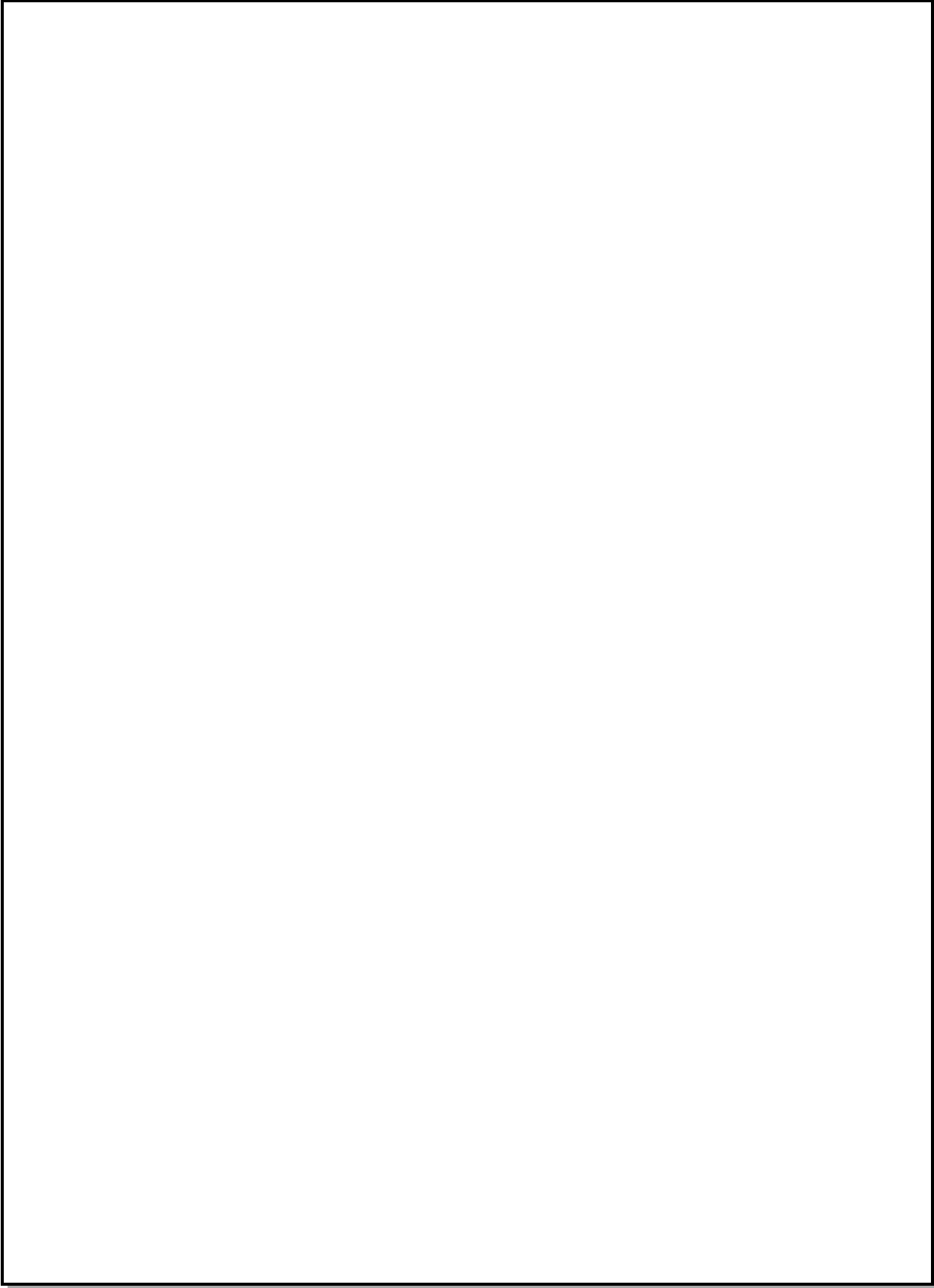
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

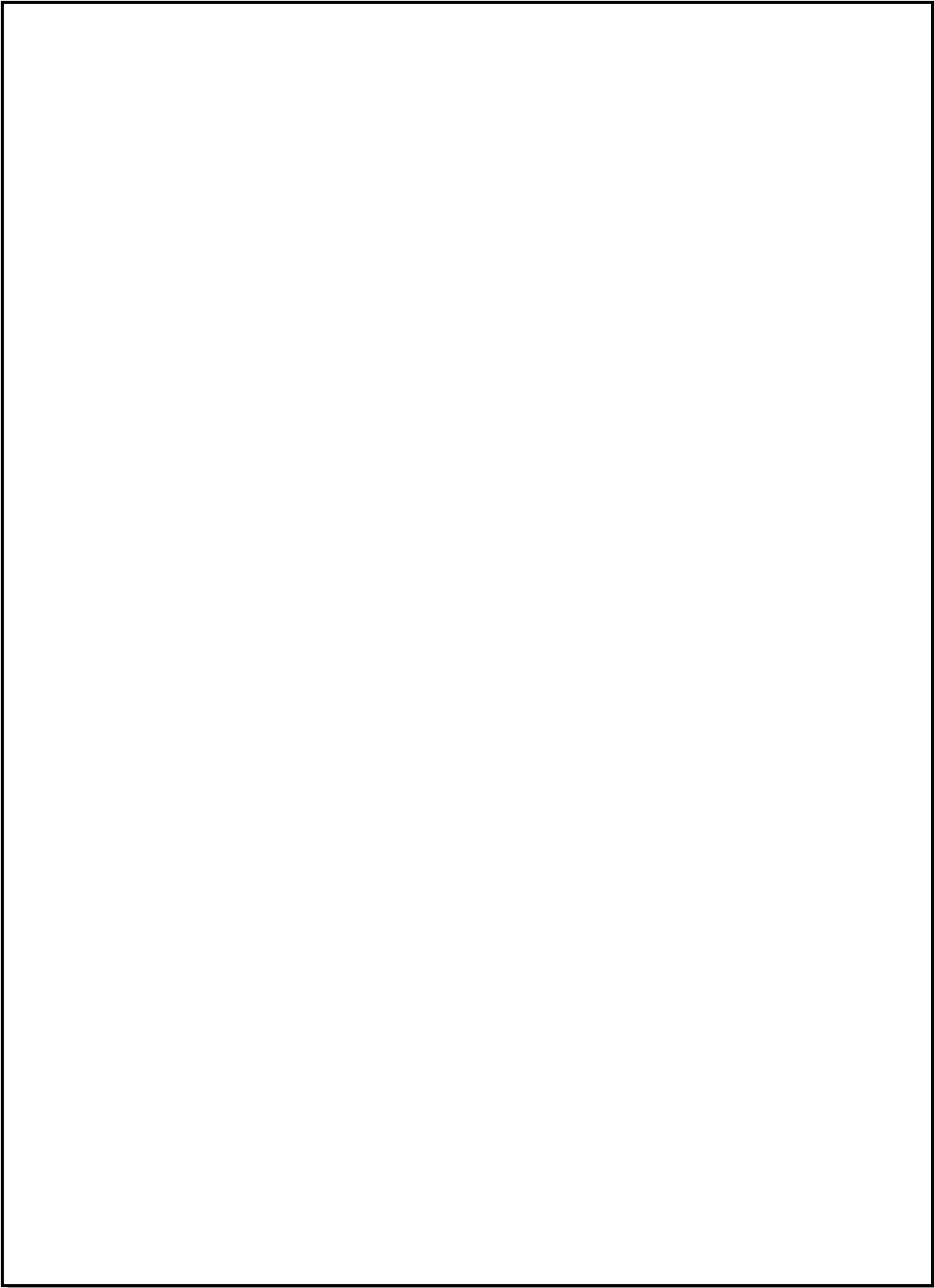
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

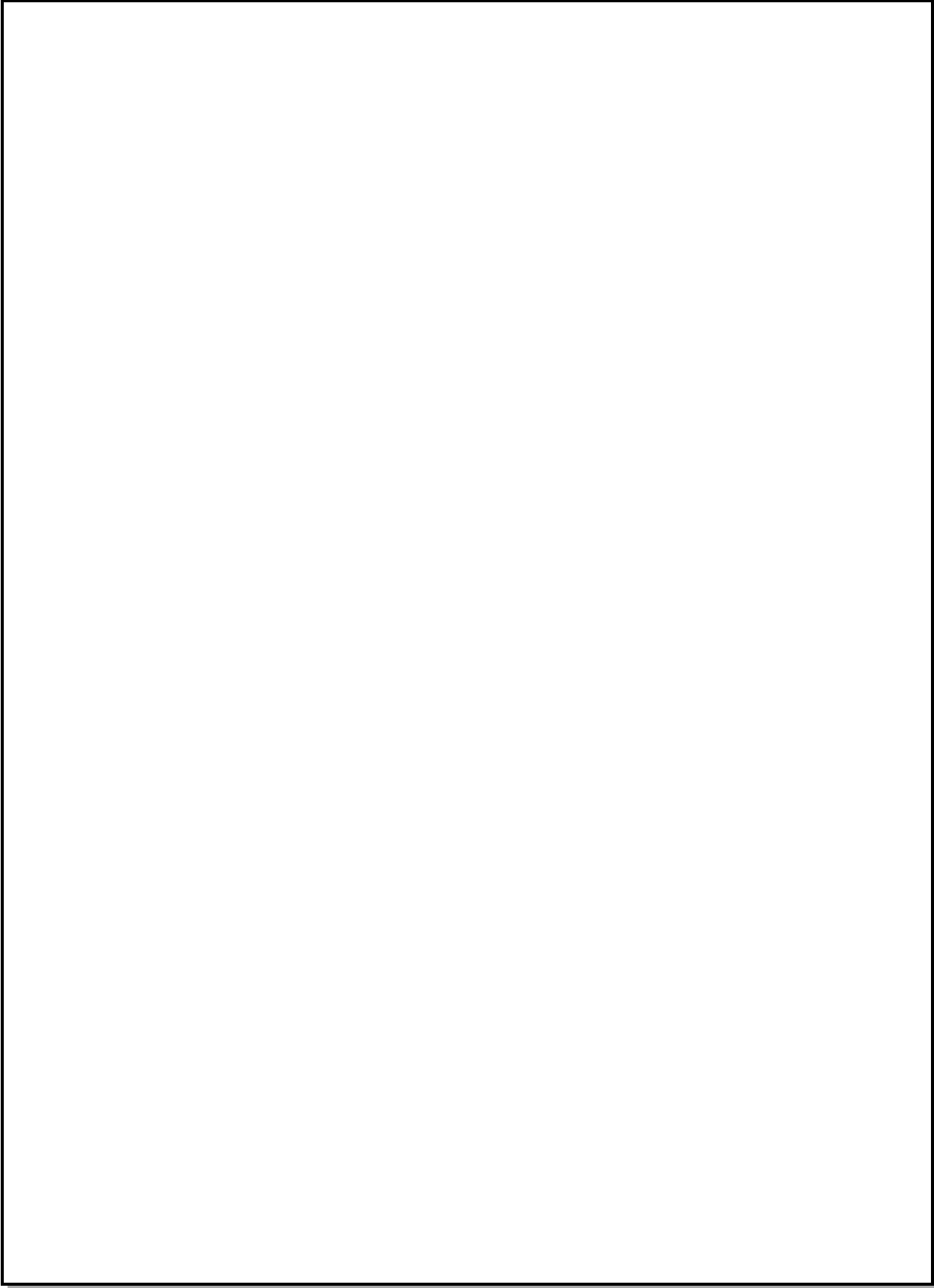
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

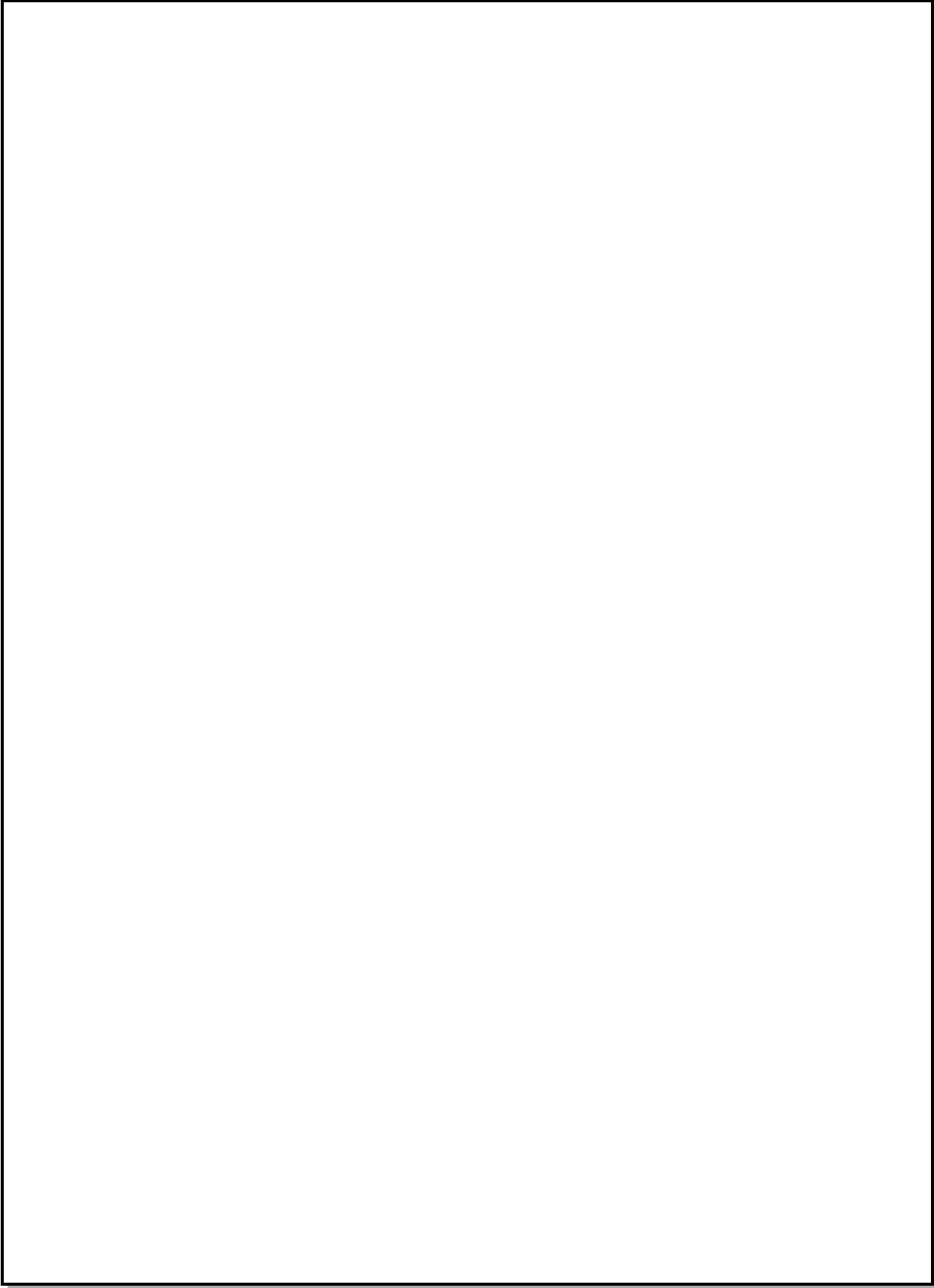
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22



CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

242

1

2

3 -->

4 (This concludes the confidential
5 portion.)

6 (Off the record at 7:18 p.m.)

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

243

ACKNOWLEDGEMENT OF DEPONENT

I, ELI LIANG, do hereby acknowledge
that I have read and examined the foregoing
testimony, and the same is a true, correct and
complete transcription of the testimony given by
me and any corrections appear on the attached
Errata sheet signed by me.

(DATE)

(SIGNATURE)

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

244

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

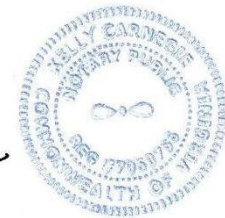
2 I, Kelly Carnegie, Certified Shorthand
3 Reporter, Registered Professional Reporter, the
4 officer before whom the foregoing proceedings were
5 taken, do hereby certify that the foregoing
6 transcript is a true and correct record of the
7 proceedings; that said proceedings were taken by
8 me stenographically and thereafter reduced to
9 typewriting under my direction; that reading and
10 signing was requested; and that I am neither
11 counsel for, related to, nor employed by any of
12 the parties to this case and have no interest,
13 financial or otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set
15 my hand and affixed my notarial seal this 12th day
16 of February, 2018.

17 My commission expires:

18 July 31, 2018

Kelly Carnegie



19
20 NOTARY PUBLIC IN AND FOR THE
21 COMMONWEALTH OF VIRGINIA

22 Notary Registration Number: 7060756

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

245

A			
able	63:21	africa	4:19, 4:20,
11:7, 20:10,	actual	14:19	4:22, 5:5, 6:20,
28:16, 31:11,	52:16, 53:15	african	6:22, 8:8, 8:11,
41:20	actually	14:16	8:21, 9:1,
aboard	8:16, 12:16,	after	11:16, 12:2,
68:19	15:21, 16:9,	12:3, 12:4,	12:7, 12:8,
about	16:11, 19:9,	12:8, 12:9,	12:19, 13:10,
10:8, 13:20,	20:10, 22:2,	12:14, 13:11,	13:21, 14:9,
16:10, 16:20,	25:21, 30:4,	17:20, 31:11,	17:8, 23:4,
17:8, 17:9,	31:16, 32:5,	33:8, 33:16,	24:12, 24:17,
17:18, 19:22,	34:9, 34:14,	33:17, 57:8,	29:8, 33:6,
32:15, 34:5,	38:7, 39:2,	62:1, 65:18	33:8, 39:18,
35:3, 35:15,	39:21, 41:13,	afternoon	42:10, 44:11,
36:20, 38:21,	41:16, 41:20,	6:9	45:22, 48:12,
39:5, 44:5,	41:21, 42:4,	again	49:2, 57:15,
45:21, 46:14,	45:14, 46:20,	21:15, 28:8,	57:18, 59:12,
49:19, 49:20,	46:22, 48:13,	28:12, 34:4,	59:16, 60:17,
50:3, 56:6,	50:20, 51:7,	51:8, 51:9,	64:1, 64:2,
57:14, 58:14,	53:8, 55:4,	52:21, 57:10,	64:4, 65:22
59:11, 60:17,	56:9, 58:13,	62:11, 68:9	akira's
66:9, 68:9, 70:1	58:15, 59:2,	against	11:20, 14:22,
absolutely	59:3, 61:5,	6:20, 31:12,	44:13, 45:22
50:22	64:6, 64:19,	32:21	akria
acceptable	66:12, 67:21	agencies	4:22
26:13, 26:15,	adapa	18:22, 19:5,	al
26:21, 27:2,	45:7	19:6, 19:7,	1:9
56:11	add	30:7, 38:13,	alexandria
accepted	43:12	62:7	1:3
63:11	added	agency	all
access	43:9	4:15, 19:11,	7:6, 8:18, 9:9,
42:22	additional	19:12, 24:7,	9:19, 10:18,
accounts	30:16	24:9, 36:12,	11:14, 13:18,
66:16	adequate	36:13, 38:15,	22:9, 23:4,
acknowledge	26:3	57:17, 63:13,	23:15, 27:1,
243:2	administration	63:20, 67:13	29:7, 31:3,
acknowledgement	21:5, 21:16	agency-wide	32:13, 40:1,
243:1	advantage	24:5	41:8, 42:3,
acquisition	24:17, 24:20,	ago	46:18, 47:5,
24:3, 24:6	24:21, 24:22,	6:16, 9:18,	48:3, 48:9,
action	25:5, 25:15,	10:2	49:10, 49:18,
1:6	27:7, 35:5	agreed	50:10, 57:1,
activities	affairs	30:20, 42:4	57:4, 57:13,
9:15, 15:7,	21:17	agreement	59:11, 61:7,
67:16, 69:14	affirmative	4:18, 4:21,	62:17, 62:19,
activity	5:8	31:4	65:20
15:7, 15:9,	affirmed	air	allen
	6:4	57:20, 64:19	43:21, 44:2
	affixed	akira	alliant
	244:15	1:5, 4:9, 4:12,	28:10, 28:20

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

246

allow 18:9, 28:11, 28:20 almost 35:4, 47:20, 50:16, 51:8, 54:12, 56:18, 66:4 already 15:19, 15:22, 19:10, 25:9, 25:22, 26:1, 26:18, 30:20, 34:21, 36:18, 50:20, 55:16 also 9:12, 11:2, 11:6, 15:16, 19:3, 26:9, 30:4, 35:10, 35:21, 37:7, 46:21, 52:4, 55:8, 58:11, 58:12 always 11:1, 14:21, 41:11, 43:17 amended 5:7 among 42:20, 65:22 amount 12:20, 31:7 andrey 5:6 announcement 4:15 announcements 57:17 another 7:15, 15:9, 20:15, 21:22, 25:15, 27:16, 57:12, 58:13 answer 5:7, 64:17, 64:22 answers 7:11, 7:16	anticipated 13:3 antiterrorism 62:2 any 7:4, 8:1, 8:4, 9:6, 23:5, 24:17, 40:15, 44:3, 44:10, 48:1, 57:16, 59:2, 60:7, 63:8, 64:8, 64:13, 69:13, 243:6, 244:11 anyone 29:4, 39:11, 39:13, 42:10, 45:2 anything 16:12, 19:18, 23:13, 33:18, 51:10 anyway 52:6 apart 66:16 apologize 13:4 appear 22:7, 243:6 apply 28:22 approach 35:13, 36:16 architect-level 45:6 area 14:11, 39:7, 65:6, 65:7 areas 19:21, 41:10 aren't 50:7, 50:8 arm 64:21 around 17:12, 33:13, 35:12, 37:10, 37:11, 40:5, 51:6, 51:7, 51:13, 51:16, 60:17, 67:19, 68:11 art 36:2 aside 39:16, 41:3, 46:19 ask 7:5, 16:22, 19:13, 26:6, 32:5, 41:8, 42:2, 42:19, 44:21, 45:14, 50:5, 63:2, 69:22 asked 41:8, 42:19, 44:15, 44:16, 45:3, 45:4, 45:8, 45:12, 45:17, 63:6, 64:16, 65:2, 67:11 asking 36:20 aspect 19:8, 21:22, 31:20 assemble 64:10 assembly 34:7 assign 54:16 assigned 49:6, 65:13 assignments 69:18 assisted 45:10 associate 20:2, 67:5 associated 25:7 associates 61:11, 63:13	assumption 29:2 at-will 4:18 attached 4:5, 70:7, 243:6 attend 67:10, 69:9, 69:12, 69:15 attended 69:13 attention 21:19, 44:13, 53:7 attractive 35:20 auction 30:18 audible 7:9 audit 63:13, 63:14 audited 63:12 audits 63:16 automatic 18:15 available 56:21 award 25:3, 26:10, 26:16, 27:17 awarded 21:6, 22:4, 26:3, 27:9, 40:22, 41:3, 63:7, 63:9 awarding 25:20, 30:8, 63:17 awards 24:8, 27:5 aware 14:1, 37:15, 37:16, 38:5, 40:10
--	--	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

247

away 10:15	35:20, 36:2, 36:11, 38:5, 38:13, 39:7, 40:4, 41:11, 46:6, 47:7, 47:17, 50:6, 50:21, 52:5, 53:2, 55:6, 56:15, 58:21, 60:4, 63:11, 65:12, 66:12, 67:17, 68:21, 69:4, 69:13	51:20 behalf 3:2, 3:10 being 6:4, 25:14, 29:3, 30:18, 41:3, 41:20, 45:7, 55:1, 55:16, 62:2, 63:9, 69:5 believe 40:15, 44:1, 62:5, 68:11, 68:15 believes 29:4 benefits 24:17, 27:22 best 7:6, 7:14, 23:16, 59:1 better 35:6 between 8:20, 31:4, 37:20, 42:9, 44:10, 53:20, 55:1, 57:9 beyond 39:16 bias 64:2 bid 18:2, 20:4, 22:2, 24:14, 25:12, 27:13, 29:5, 29:8, 29:15, 30:12, 36:17, 39:10, 39:11, 39:13, 50:22, 55:21, 57:19, 59:17, 63:10 bidders 25:1, 25:11, 32:22 bidding 9:14, 25:11,	25:21, 27:12, 27:14, 32:7, 36:10, 54:2 bids 11:3, 55:9, 62:11 big 54:21 bill 45:13, 52:6 billable 48:17, 48:19 billing 50:15, 53:17, 53:19 bills 67:22 bis 49:14 bit 17:2, 49:7, 49:8, 49:12, 54:22, 55:3 bits 49:13 board 61:18 boards 21:4 boots 69:8 booz 43:21, 44:2 both 16:5, 57:22, 65:13, 69:11 bredehoft 3:12 bring 44:12, 63:22 brings 58:18 broad 4:15, 18:20, 57:17 broader 32:22, 36:5, 54:8
B			
b&p 11:4, 11:13, 55:11, 55:12			
baa 57:19, 58:17, 59:17, 61:1, 61:4, 62:13, 64:4, 64:14			
baas 57:21, 60:3, 60:5, 61:8, 62:20, 63:20, 63:21, 64:5, 64:8	become 9:16, 52:9 becomes 31:22, 32:22, 35:22 been 6:14, 8:17, 10:1, 10:3, 11:1, 12:6, 12:7, 20:5, 26:18, 27:12, 29:13, 37:15, 39:21, 42:9, 43:19, 46:15, 46:16, 48:3, 48:20, 49:1, 49:2, 51:2, 51:5, 51:7, 51:20, 55:11, 55:14, 57:18, 58:8, 58:16, 60:3, 60:4, 60:6, 60:17, 62:14, 66:9, 66:11, 68:21 before 2:15, 6:14, 18:10, 18:11, 33:10, 34:1, 34:12, 34:21, 51:11, 59:1, 244:4 began 60:20 beginning 10:1, 18:16,		

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

248

brought 21:19, 46:22, 61:18, 62:6, 62:7, 64:2, 68:19 brown 3:12 build 34:2 building 11:8 bunch 36:9, 56:16 business 9:11, 9:12, 9:14, 9:15, 10:16, 10:19, 10:22, 11:8, 15:3, 15:4, 15:5, 15:12, 21:22, 23:6, 23:10, 31:20, 32:13, 33:2, 33:9, 36:20, 38:1, 38:16, 39:7, 39:17, 40:6, 41:7, 42:11, 43:18, 44:1, 44:12, 46:1, 47:7, 47:8, 47:9, 47:10, 47:16, 47:18, 48:1, 48:3, 48:4, 48:20, 52:14, 53:6, 57:14, 65:21, 66:12, 66:15, 66:18, 66:20, 67:15, 68:13, 68:14, 69:14 businesses 28:10, 38:12 busy 43:8 buy 24:7 <hr/> C <hr/> call 33:20	called 21:13, 23:21, 24:3, 29:16, 54:5, 55:12, 61:11 came 9:1, 9:3, 9:9 can 7:10, 7:11, 7:15, 7:17, 13:20, 14:16, 15:3, 16:12, 16:13, 16:21, 17:15, 17:17, 23:2, 23:14, 24:8, 26:7, 26:10, 26:20, 26:22, 27:16, 27:18, 28:1, 28:21, 29:4, 30:1, 30:2, 30:4, 30:10, 33:4, 35:7, 38:22, 39:5, 39:11, 39:13, 40:16, 41:17, 47:14, 49:20, 49:21, 51:12, 55:21, 56:19, 59:5, 59:6, 61:2 can't 47:2, 47:17, 62:12 cannot 47:22 capacity 33:3 care 14:11, 14:13 carnegie 1:22, 2:15, 244:2 carry 26:5 case 7:4, 16:4, 16:5, 18:10, 26:12, 26:19, 29:5, 31:17, 47:20, 48:10, 244:12 cases 19:17, 19:20, 26:10, 27:8, 53:6, 56:1 categories 57:4, 57:5, 57:8 category 27:15, 47:6 center 46:21 ceo 11:16, 11:20, 11:21, 37:7, 40:18, 41:4 certain 24:7, 25:2, 38:4, 40:11, 47:18, 48:20, 49:11, 58:20, 61:21, 63:3 certainly 19:17, 19:20, 27:4, 69:2 certificate 244:1 certified 2:16, 244:2 certify 244:5 cfsan 46:12 chain 4:14, 5:4 change 10:12, 10:17 changed 10:11, 10:20 changes 52:15 characterize 10:17, 15:8 charges 67:2 charlson 3:12	chart 62:21 chat 5:2 check 25:18, 26:6, 26:16, 26:20 chennamaraja 11:19 chief 9:3, 9:7, 68:16 child 14:19 childhood 14:20 christopher 3:3 church 1:16, 2:8, 3:6 cio 65:2 cio-cs 23:18 circumstances 52:13 civil 1:6 clear 27:7, 32:7 clearly 34:8 client 49:4, 52:5, 61:16, 65:13, 69:8, 69:17 clients 39:9 close 14:7, 38:4, 53:7 closely 25:7 closer 34:10 closing 12:16 codes 31:10
---	---	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

249

cohen 3:11, 3:12, 4:3, 6:8, 7:3, 13:5, 13:8, 70:2 com 30:16, 30:17 combine 35:19 come 17:18, 19:21, 20:8, 21:7, 21:18, 26:14, 31:14, 40:10, 44:3, 65:16 comes 11:14, 16:14, 18:1, 18:14, 34:1, 34:12, 34:22 coming 11:9, 17:14, 18:17, 37:16 command 57:20 commercial 13:15, 13:16, 13:19, 13:22, 14:10 commingled 16:2, 16:6 commission 244:17 commonwealth 2:18, 244:21 companies 18:6, 43:20, 55:22 company 9:13, 11:6, 17:16, 18:5, 20:3, 21:6, 21:13, 22:4, 37:21, 45:14, 51:19, 61:11, 65:11, 67:17 compete 28:1, 31:11, 31:12	competing 32:21, 56:9, 56:16 competitive 18:20, 55:19, 59:6 competitors 25:8, 28:2 complaint 5:8 complete 243:5 completely 12:5 composed 15:6 computer 65:6 concentrate 19:5 conceptant 1:8 concerning 18:22 concludes 242:4 condition 8:4, 30:10 confidential 1:13, 5:12, 70:3, 70:5, 70:9, 242:4 congress 17:22 connection 6:19, 6:21, 10:19 consequence 57:3 consider 14:17, 42:1 considered 14:17, 62:22 consistency 68:18 consistent 69:4 construction 36:15	consultant 66:14 consulting 61:14, 61:17 content 56:21 context 54:22, 69:11 continuously 8:11, 8:21 contract 17:20, 17:22, 18:5, 18:14, 19:10, 21:6, 21:12, 21:20, 22:3, 22:5, 23:5, 24:13, 25:11, 25:12, 25:13, 25:20, 26:3, 27:8, 28:1, 29:11, 29:14, 29:20, 29:22, 30:8, 30:9, 30:19, 30:22, 31:2, 31:14, 34:17, 35:1, 36:11, 39:4, 41:4, 41:20, 47:1, 47:11, 47:12, 47:13, 48:2, 48:7, 49:4, 49:6, 49:7, 49:8, 49:12, 49:15, 50:6, 50:17, 51:4, 51:6, 51:14, 52:10, 52:16, 52:17, 52:19, 53:12, 53:18, 54:2, 54:3, 54:16, 55:1, 55:4, 56:3, 63:7, 63:9, 63:17 contracting 26:1, 30:7, 30:8, 34:19, 36:3, 36:8, 47:1, 47:8, 63:13 contractor 31:19, 32:4, 32:13, 58:1 contractors 19:4, 31:12, 31:13, 31:19 contracts 11:10, 24:1, 24:3, 24:6, 25:4, 25:17, 26:10, 27:5, 27:9, 28:9, 28:20, 31:13, 38:7, 38:9, 38:20, 40:2, 40:15 contractual 47:15 coo 9:10, 10:13 coordinator 55:6 corporate 25:18, 26:4, 26:17 corporation 61:12 correct 7:12, 8:13, 12:2, 12:19, 12:21, 13:9, 29:10, 243:4, 244:6 corrections 243:6 could 10:1, 10:3, 15:21, 18:11, 22:1, 22:2, 32:19, 34:2, 36:9, 36:10, 39:10, 41:13, 41:15, 41:16, 41:17, 43:2, 44:22, 46:15,
---	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

250

46:16, 48:8, 64:12, 64:16 couldn't 31:17 counsel 6:7, 244:11 count 47:2 counterclaim 5:9 counterterrorism 62:2, 62:9 course 49:17, 52:19 court 1:1, 7:10, 7:17 craig 68:17 crap 31:22 create 54:15 criteria 28:19, 28:22 critical 38:15 cs 23:18 csr 1:22 cultivate 11:2 cultivated 58:1 current 24:4, 47:11, 47:12 custom 64:14 customer 15:17, 15:20, 16:2, 16:3, 16:5, 16:9, 16:19, 16:22, 17:6, 31:22, 33:12, 33:18, 33:20, 33:21, 34:3, 34:5,	34:7, 35:3, 35:6, 38:22, 39:3, 47:14, 50:4, 50:8, 50:10, 50:11, 50:12, 53:22, 63:16, 67:6 customers 11:5, 11:10, 15:9, 15:10, 15:16, 67:12 cut 49:3, 50:3, 56:21 cycle 40:9, 51:4, 51:5 <hr/> D <hr/> database 17:17, 20:12 databases 18:9, 37:2, 37:8, 37:16, 41:6, 41:9, 42:3, 43:1 date 49:1, 243:11 dates 51:12 day 26:22, 34:15, 244:15 days 26:11, 27:6, 34:14, 67:18 dcaa 63:12 deals 54:10 decided 54:3, 54:4, 55:16, 61:21 decision 51:22 decisions 59:1 def 4:17, 5:3	defendant 5:6 defendants 1:10, 3:10, 6:7, 7:4 defense 61:22, 63:12 defenses 5:8 definitely 55:5 degree 53:10, 53:12 delivering 39:4, 40:13 delivery 25:22 deltek 17:15, 17:16, 18:9, 18:19, 20:16, 20:17, 43:1 department 21:17, 24:7, 24:9, 61:22 depend 45:22, 46:2 depended 46:6 depending 32:20 depends 53:22, 54:1 deponent 243:1 deposed 6:14 deposition 1:15, 2:1, 4:6, 70:3, 70:6, 70:8 designate 70:3 designated 70:5 desire 53:5 determine 56:10	develop 11:3, 19:19, 33:13, 44:1, 62:8, 65:7 developed 47:3, 62:16, 62:18 developing 9:12, 11:4, 35:10, 66:18 development 9:11, 9:15, 10:16, 10:19, 10:22, 12:18, 13:14, 14:12, 14:20, 15:3, 15:4, 15:5, 15:13, 17:7, 21:22, 31:20, 32:14, 33:2, 35:22, 36:19, 36:20, 38:1, 38:16, 39:7, 43:19, 48:21, 52:14, 53:6, 56:20, 65:21, 66:13, 66:15, 67:16, 68:13, 68:15, 69:14 devotes 12:20 dhs 23:17 did 8:9, 8:20, 8:22, 9:16, 10:5, 10:12, 11:11, 11:13, 21:18, 32:14, 37:3, 37:6, 37:7, 37:9, 37:11, 39:16, 40:16, 41:4, 41:5, 41:8, 42:2, 42:5, 42:10, 44:20, 44:21, 45:10, 45:14, 45:21,
--	---	--	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

251

45:22, 46:2, 46:12, 46:21, 52:2, 52:9, 52:11, 56:22, 57:2, 57:6, 59:12, 59:16, 59:18, 63:22, 64:4, 68:4 didn't 19:22, 20:1, 20:2, 32:15, 38:3, 46:11, 51:10, 53:7, 56:14, 57:16, 58:19, 58:21, 64:8, 64:13 difference 30:18, 53:20, 55:1 different 24:9, 36:4, 41:1, 44:9 difficult 8:2, 8:5, 68:20 direct 30:22, 31:2 direction 244:9 directly 11:16, 30:9, 48:1 director 46:7, 46:8 disappointed 43:20 discovered 15:22, 52:21 discussion 57:14 discussions 8:15 dissolve 69:1 distinct 15:6, 15:18, 16:7, 17:4, 35:11 distinction 29:21, 29:22,	30:6 distinguish 29:17 distinguishing 29:19 district 1:1, 1:2 division 1:3 documents 69:21 dod 63:11 does 17:8, 23:4, 24:12, 24:16, 33:6, 44:19, 54:12, 67:22 doesn't 12:4, 32:2 doing 25:3, 31:8, 32:18, 48:20, 50:8, 55:9, 61:14, 65:5, 66:20 don't 6:17, 7:5, 8:16, 13:5, 16:10, 17:3, 18:3, 18:4, 18:6, 19:18, 24:4, 24:11, 26:6, 26:16, 27:7, 29:5, 39:11, 41:22, 52:12, 53:15, 55:3, 55:7, 58:12, 64:11, 67:18, 68:10 done 26:2, 26:18, 31:21, 32:9, 32:10, 36:21, 41:15, 43:21 down 7:11, 7:17, 11:14, 50:3	drive 3:13 drops 34:16 duly 6:4 during 12:7, 13:9, 13:10, 13:20, 29:7, 42:8, 49:11, 50:17, 57:15, 57:18, 60:16, 64:3 duties 9:10, 9:11, 10:10, 10:12, 10:15, 10:16, 10:18, 10:22, 37:21, 38:6, 38:7, 38:20, 48:11, 49:5 duty 44:12, 48:13, 48:15, 48:16, 49:16, 49:17 <hr/> E <hr/> e-l-i 6:12 e-mail 4:7, 4:10, 4:13, 4:14, 5:4, 20:22, 21:3 e-n-t-z-e 6:13 each 30:7 earlier 34:5, 56:2, 62:3, 67:9 early 58:8 eastern 1:2 education 14:20 effect 36:8	effectively 50:16, 51:10, 52:5 efficient 28:15 efficiently 28:17 effort 59:2, 59:4, 62:15 eli 1:15, 2:1, 4:2, 6:3, 6:12, 243:2 else 23:13, 45:2, 46:16, 55:21, 59:10 emanating 42:12 employed 244:11 employees 19:3, 19:13, 19:22, 20:7, 40:19, 41:9, 42:2, 42:3, 42:14, 42:15, 42:18, 42:21, 43:5, 43:22, 44:6, 44:11, 44:15, 45:5, 49:18, 65:22, 67:10, 69:7 employers 20:8 employment 4:18, 4:21 encountered 19:17 encourage 19:15 encouraged 43:17, 44:6, 67:11 end 18:1, 18:14, 18:15, 40:21, 42:10
---	---	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

252

ended 50:4 ends 47:13, 69:5 entire 11:15, 36:15, 66:18 entity 27:22 entze 6:12 errata 243:7 esquire 3:3, 3:11 essentially 10:10, 36:15, 65:10, 65:11 establish 28:18, 30:22 estimated 61:1 estimating 60:13, 60:15, 60:16 et 1:9 evaluate 28:13, 28:17, 28:18 evaluation 25:3, 25:16, 26:8 even 10:9, 10:10, 14:3, 19:6, 26:10, 26:20, 27:5, 27:9, 27:16, 27:18, 27:20, 30:16, 33:17, 34:2, 34:10, 38:22, 43:6, 45:8, 45:12, 50:14, 50:17, 53:3, 55:4, 57:1, 60:1, 62:14, 63:10, 68:22,	69:15 events 8:2 ever 6:14, 14:9, 29:8, 57:18, 59:16, 64:4 every 23:9, 68:1 everyone 28:5, 28:6, 67:3 everything 7:17 exact 52:12 exactly 6:18, 20:19, 40:10, 62:12, 68:10 exaggeration 56:19 examination 4:2, 6:7 examined 6:6, 243:3 example 17:11, 21:11, 22:6, 25:17, 36:10, 43:1, 44:16, 45:7, 46:12, 54:2, 62:12, 69:10 exception 31:1 exceptions 46:11, 48:4 executing 52:17 exhibit 4:7, 4:10, 4:13, 4:14, 4:15, 4:18, 4:20, 5:2, 5:4, 5:6, 70:6 exhibits 4:5, 4:6 existing 39:2, 56:3	experience 25:19, 26:5, 26:17, 36:12, 63:20, 63:22 expired 31:16 expires 244:17 explain 15:4, 30:10, 35:7, 48:15 explained 37:22 explains 19:4 exploration 43:16 explore 43:15 extremely 66:3 eyes 49:19 <hr/> F <hr/>	29:15, 30:13, 31:7 fda 42:8, 42:12, 42:18, 42:20, 44:13, 44:17, 45:1, 46:1, 47:4, 48:2, 49:7, 49:8, 49:12, 49:13, 49:18, 54:22, 69:11 fdabaa--n 4:16 february 1:17, 244:16 fedbid 30:16 federal 12:3, 13:11, 14:3, 15:1, 17:12, 17:19, 18:8, 20:21, 22:18, 23:12, 30:14, 37:17, 61:15 feed 38:21 feel 42:5, 56:18 feeling 60:5, 63:19 feet 19:9, 19:12, 38:13 felt 42:6, 64:6, 64:9 few 19:5, 19:6, 27:13, 28:11, 51:18, 59:20, 64:15, 68:18 fewer 28:22 field 59:5, 59:6 financial 244:13
--	--	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

253

find 31:18, 32:4, 43:5, 45:1, 45:15, 46:11, 47:14, 64:14 fine 6:10, 36:22 finish 13:6 finished 13:1 first 5:7, 6:4, 16:14, 37:10, 40:17, 48:7, 57:5, 64:22, 66:4, 66:5 first-won 48:2 firsthand 63:19 firstsource 23:17 fitzpatrick 68:17 five 17:21, 56:6 focus 14:22, 38:12 focused 20:6, 37:21, 37:22, 38:8, 38:9 focusing 53:4, 53:5 follow-on 47:7, 47:9, 47:10, 47:16, 48:1, 49:9, 49:15 follow-up 43:9 following 50:19, 50:21, 51:1, 70:4 follows 6:6 force 62:5, 62:6	foregoing 243:3, 244:4, 244:5 foreign 13:17, 13:18 forgotten 22:12, 22:13, 49:1 formal 14:2 formality 53:16 formally 52:22, 53:8 forum 20:21 forward 70:2 found 19:20 frame 52:9 freddie 61:16 freely 41:10, 42:22 from 8:12, 8:15, 10:13, 11:6, 15:18, 18:3, 21:2, 24:9, 31:6, 32:2, 35:11, 35:14, 37:10, 38:5, 39:16, 40:12, 41:16, 42:12, 44:13, 46:1, 46:19, 47:21, 51:15, 56:13, 56:22, 57:1, 57:12, 60:22, 65:20, 66:6, 66:9, 66:14, 66:16, 70:2, 70:4 front 16:19 full 6:11, 11:18,	27:11, 27:12, 28:4, 29:8, 29:16, 29:20, 30:2, 30:3, 32:19, 32:21, 62:16 full-time 50:16, 51:8, 51:9, 51:15, 51:18, 52:1, 52:6, 52:7 further 43:16, 65:8 future 18:12, 43:15 <hr/> G <hr/> gathering 17:9, 18:21 gave 39:6, 41:10, 63:18 general 60:5 generally 14:17, 56:4, 59:8 generating 46:1 get 20:22, 28:22, 33:21, 39:8, 43:8, 51:10, 69:7 getting 34:10, 41:21, 50:7 give 26:14, 34:13, 37:19, 42:22, 47:15, 51:12, 69:22 given 243:5 gives 54:17 go 12:4, 17:8,	25:2, 28:19, 31:10, 31:18, 32:19, 33:16, 33:17, 37:1, 50:12, 55:19, 55:21, 58:22 goals 47:18 goes 12:3, 47:8 going 13:5, 13:11, 16:18, 18:22, 28:18, 29:1, 31:7, 33:16, 35:16, 35:17, 35:18, 35:20, 47:20, 55:17, 56:7, 57:12, 59:7, 64:22, 69:20, 69:21 gone 12:8, 12:9, 12:14, 65:17 good 6:9, 40:20, 47:10, 64:7, 66:10, 66:11 gosh 64:16, 65:4 got 22:2, 39:15 gotten 38:1 gov 20:13, 29:15, 30:13, 31:7 government 9:12, 9:14, 12:3, 12:10, 12:11, 13:11, 13:17, 13:18, 14:2, 14:3, 14:4, 15:1, 17:20, 18:8, 19:4, 24:22, 25:9, 26:9, 28:8, 28:14,
---	---	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

254

29:2, 30:15, 30:22, 34:19, 35:17, 36:3, 36:8, 39:9, 47:8, 54:4, 54:12, 54:17, 54:18, 55:16, 56:4, 61:13, 61:19 government-wide 24:3 green-gate 58:2, 65:1, 65:10 ground 19:9, 19:12, 20:7, 69:8 group 17:12, 58:17, 61:14, 62:4 groups 62:8 grow 46:9 gsa 23:17, 30:17 guess 47:2, 51:6, 51:20, 61:12 guns 56:14, 56:15	62:17, 62:21, 63:9, 63:10, 64:6, 64:9, 64:21, 65:11, 65:15, 69:17 half 6:17, 50:3, 50:15, 69:15 half-time 50:6, 50:7, 50:18, 51:1, 51:10, 51:15 hand 56:19, 244:15 handberg 68:3, 68:19 happen 18:12, 27:18, 46:16 happened 18:10, 18:11, 21:4, 64:19 happening 19:16, 35:2 happens 27:20 hardest 39:8 has 10:20, 12:8, 13:10, 14:5, 14:9, 17:16, 18:8, 21:7, 25:9, 26:1, 26:18, 29:7, 29:8, 29:13, 30:18, 30:22, 31:2, 36:1, 36:8, 39:22, 40:9, 45:13, 54:8, 55:16, 57:15, 57:17, 60:17 hate 59:8 haven't 31:21, 31:22, 32:9	having 19:9, 50:8, 53:14, 56:2, 66:11, 66:19, 69:2 he's 13:1, 37:15, 50:7, 65:2, 68:7 health 14:11, 14:13, 14:16, 17:12, 20:17, 20:21, 21:5, 21:14, 21:15, 21:16, 37:17, 46:7, 46:8 hear 38:17, 49:19, 49:20, 57:16 hearing 27:21 heart 38:4 heavy 56:14, 56:15, 62:15 held 2:1, 9:6 help 16:13, 16:21, 66:17 helped 45:15 helping 67:3 her 53:14 here 15:18, 56:9, 70:2 here's 19:2 hereby 243:2, 244:5 hereunto 244:14 hi 39:3	high 35:13, 63:21 high-level 45:5, 45:6 higher 33:4, 60:2 him 11:20, 16:19, 38:21, 44:20, 44:21, 45:14, 46:7, 49:3, 50:4, 50:22, 51:8, 51:9, 51:15, 51:17, 51:22 hired 42:6, 46:6, 57:7, 61:19, 66:12, 66:13 his 11:18, 37:21, 38:4, 38:5, 38:19, 45:9, 45:14, 48:13, 48:15, 48:16, 49:2, 49:3, 49:5, 49:16, 50:15, 52:17, 67:1 history 42:16 hold 23:10, 51:16, 58:11 holding 67:2 homeland 62:7 homework 26:2 hope 41:11 horse 56:17 horses 56:17 houle 45:3
H			
had 10:10, 10:15, 12:15, 15:1, 19:19, 19:21, 21:19, 23:2, 25:12, 27:8, 38:7, 41:9, 41:11, 41:14, 42:13, 45:3, 45:4, 47:1, 48:7, 53:2, 53:10, 53:11, 55:4, 55:5, 61:12, 61:20, 61:21, 62:15,			

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

255

how 6:9, 6:16, 10:16, 13:5, 14:14, 17:8, 33:19, 35:13, 35:19, 56:6, 59:11 however 54:11, 60:7 huge 31:7 hundred 60:1, 60:10, 60:18, 61:1, 62:11, 62:17	important 41:22 inc 1:5, 1:8, 4:20 include 11:11, 31:3, 36:9 including 21:4, 65:22 incorrect 60:13 increased 31:9 incumbents 34:20 individual 25:21, 66:16 individuals 44:3 industry 17:11, 17:12, 61:22 information 1:13, 22:19, 38:21, 63:1, 65:6 initiating 34:8 instances 12:6 institute 54:8 intel 18:20 intelligence 15:8, 15:10, 15:14, 15:18, 15:19, 16:5, 16:14, 17:6, 17:9, 18:21, 31:21, 33:11, 34:5, 34:6, 61:22, 62:7 intensive 19:8 interest 63:16, 244:12 interested 63:2	interrupted 59:13 into 18:5, 36:19, 47:6, 62:16, 62:18, 64:1, 64:2 introduce 16:3 introduces 16:4 investment 33:5, 34:16, 51:11 invite 69:11 involve 14:1, 36:10, 54:9 involves 11:7, 15:13, 16:16, 33:14 involving 12:17 it's 14:18, 16:7, 20:20, 21:14, 24:6, 25:9, 26:12, 26:19, 28:6, 28:16, 29:10, 29:18, 30:6, 32:7, 35:12, 35:15, 36:4, 38:1, 47:9, 47:10, 54:2, 54:18, 54:19, 54:20, 59:5, 59:6, 60:8, 67:19, 69:6 its 12:20, 13:11, 23:21, 244:13	57:4, 57:5, 57:8 joined 55:13 josh 45:2, 45:21, 46:2, 46:6, 46:15, 48:6, 49:1, 50:2, 50:4, 50:5, 52:5, 57:7, 57:9, 69:12, 69:14 josh's 48:11 joshua 44:16 judge 26:7 july 244:18 june 4:10, 4:14, 8:17 just 12:12, 16:11, 20:2, 21:6, 21:7, 22:6, 23:16, 24:6, 24:11, 26:6, 26:7, 28:12, 36:14, 44:18, 46:16, 51:2, 52:6, 53:1, 53:7, 53:15, 54:1, 54:12, 54:16, 55:17, 56:10, 57:10, 57:11, 57:12, 59:4, 59:8, 59:9, 60:12, 65:18, 66:16, 67:19, 69:6
I			
i'll 7:6, 48:15, 69:22 i've 10:9, 22:12, 36:18, 43:19, 49:1, 55:11 idd 1:7 identification 17:3, 17:4, 70:7 identified 33:9, 39:19, 39:22, 40:18, 40:19, 46:15, 47:5 identifies 33:6 identify 11:1, 11:2, 32:3, 37:8, 39:17, 40:17, 41:12, 44:22, 46:12, 46:22, 67:12 identifying 15:2, 15:13, 16:16, 41:6, 42:11, 46:2 ii 23:17			
		J	
		job 1:20, 42:5, 46:8, 49:5,	
			K
			keep 49:18, 67:20 keeping 20:5, 67:20

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

256

kelly 1:22, 2:15, 244:2 key 14:15, 14:21, 38:6, 38:10, 38:11 kick 34:11 kind 16:6, 16:20, 17:4, 18:7, 19:19, 20:6, 25:6, 28:19, 29:19, 30:4, 32:10, 37:20, 39:6, 47:20, 56:5, 59:2, 63:18, 63:21, 64:21, 67:16 kinds 9:15, 18:13, 32:18, 48:20, 49:22, 65:15 know 6:17, 8:16, 9:14, 10:6, 10:20, 12:1, 13:5, 14:9, 14:20, 15:20, 16:7, 16:9, 16:11, 16:12, 16:20, 17:13, 17:16, 18:22, 19:6, 19:10, 19:14, 20:4, 22:15, 24:4, 25:10, 26:1, 26:11, 26:19, 27:5, 28:11, 28:15, 30:17, 31:15, 32:6, 32:15, 33:2, 33:15, 33:22, 34:7, 34:9, 35:1, 35:5, 35:6, 35:9, 35:12, 35:13,	35:15, 36:7, 37:17, 38:13, 38:16, 39:3, 39:5, 41:11, 43:13, 43:20, 44:18, 44:22, 47:18, 49:21, 53:4, 53:10, 53:15, 56:5, 56:6, 56:7, 56:8, 56:15, 56:17, 57:3, 57:4, 57:7, 57:10, 57:11, 59:20, 60:13, 62:6, 65:3, 65:12, 67:5, 67:6, 67:9, 67:12, 67:21, 69:10, 69:17 knowledge 46:17, 55:9 known 30:14, 36:13, 41:14 knows 39:9 <hr/> L <hr/> label 69:21 labor 40:13 larger 28:9 largest 21:17 last 48:17, 49:2, 66:8 late 52:8, 52:19, 57:7, 57:9 later 19:20 law 2:6, 3:4 lawsuit 6:19, 6:21	learned 46:13 least 9:17, 23:19, 36:3, 66:5 leave 32:5 left 45:10, 49:2, 51:4, 51:19, 57:9 legal 47:14 less 14:2, 25:8, 25:9, 31:8, 40:10 let 8:13, 10:20, 17:20, 25:14, 29:17, 49:21, 60:12, 60:13 let's 10:2, 11:9, 14:22, 17:21, 18:1, 18:3, 18:14, 19:11, 26:21, 31:15, 33:1, 36:5, 39:1, 41:18, 42:9, 59:9, 59:10, 62:16, 64:11, 64:17, 65:9 letting 15:20 level 21:15, 25:19, 26:18, 35:13 leverage 19:2 liang 1:15, 2:1, 4:2, 4:6, 6:3, 6:12, 6:13, 70:6, 243:2 like 14:19, 16:18,	17:10, 17:11, 18:9, 20:20, 20:21, 28:10, 28:20, 30:16, 30:20, 33:14, 33:15, 36:9, 37:12, 38:22, 40:4, 43:1, 43:10, 43:12, 43:14, 43:21, 45:6, 45:7, 45:13, 46:12, 49:13, 49:14, 50:13, 53:1, 56:5, 56:15, 62:10, 62:21, 63:4, 64:9, 65:16, 65:19, 66:17, 69:11 liked 63:5 likely 25:10 limited 33:2, 35:7, 63:3 lisa 45:3, 52:9, 69:11, 69:12 list 23:14 listen 19:13, 19:15, 20:8 literally 21:2 little 17:2, 36:4, 56:19, 62:11, 69:21 lloyd 45:13 lo 1:7 local 14:4 locked 18:5
--	---	---	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

257

long 6:16, 40:14, 45:11, 63:15 longer 31:11, 45:8 look 17:10, 17:15, 17:17, 22:1, 35:19, 37:2, 37:7, 41:9, 41:17, 42:3, 42:20, 42:21, 43:3, 44:17, 46:10, 64:11, 65:3 look-out 44:7 looked 65:4 looking 18:8, 33:3, 41:6 lost 57:22, 61:5, 63:16 lot 23:15, 32:12, 39:11, 42:14, 46:14, 47:8, 56:1, 57:2, 62:1, 65:18, 69:4 low 61:8 lower 34:18, 60:5 lowest 26:12, 26:15, 27:3 lpta 26:13 <hr/> M <hr/> mac 61:16 made 51:22, 52:20, 52:22, 62:10,	62:14, 64:15 main 37:3, 37:6, 49:4, 61:16 mainly 61:14 major 18:19 majority 27:15 make 8:2, 8:5, 32:2, 35:19, 45:18, 46:9, 52:17, 58:22, 59:1, 64:17 makes 43:22, 68:20 making 7:2 malaria 14:19 management 38:19, 54:7 manager 52:9, 52:12, 52:20, 52:22, 53:2, 53:9, 53:21, 54:5, 54:8, 54:10, 54:14, 54:18, 54:19, 54:20, 55:2, 55:4, 66:13 managing 38:7, 38:20 mandates 17:22 many 16:7, 16:17, 19:4, 33:19, 35:21, 52:15 marked 70:7 market 29:16, 29:18, 30:1, 30:3, 30:5, 30:7,	30:13, 30:14 marshalling 33:1 master 30:20 match 64:7 matter 33:1 may 4:7, 8:10, 8:12, 8:15, 14:1, 14:6, 14:7, 17:13, 18:17, 23:21, 56:18, 58:15, 68:21 maybe 6:17, 19:6, 20:3, 43:14, 47:18, 53:6, 53:11, 63:4, 66:5, 69:15 mean 38:3, 41:3, 41:16, 44:19, 45:11, 45:21, 61:9, 61:10, 64:3, 69:5 meaning 15:14, 28:17, 42:17, 45:6, 53:13, 54:4 means 7:6, 25:7, 26:8, 29:18, 41:19, 54:13, 57:3, 60:8 mechanisms 57:16 medical 8:4 medication 8:1 meet 38:22, 39:3, 39:12, 39:14 meeting 33:20, 50:9,	67:3, 69:6 meetings 39:8, 50:13, 65:21, 66:7, 66:12, 67:8, 67:10, 68:13, 68:15, 69:1, 69:2, 69:9, 69:12, 69:19 mention 11:11, 24:2 mentioned 15:2, 20:12, 20:15, 20:18, 37:18, 48:4, 56:2, 60:10, 62:3 mentioning 57:17 michael 68:3, 68:19 middle 6:12, 18:17 might 8:17, 12:15, 20:3, 20:9, 20:10, 58:8, 60:3, 62:14 mikhailchuk's 5:6 million 54:3 mind 20:5, 25:12, 44:4 mingling 17:5 minimum 28:19 mixed 43:4 monday 67:19, 68:1 money 32:12, 62:1 month 68:22 months 51:18, 68:22
---	---	---	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

258

more 10:15, 17:1, 17:5, 18:20, 22:14, 23:20, 24:10, 35:15, 37:9, 37:15, 37:16, 37:21, 37:22, 38:1, 50:5, 50:21, 54:7, 56:8, 69:16	names 24:11 nasa 23:18 nations 14:16 natural 35:5 naval 57:20, 64:19 navy 23:14, 23:19, 57:20 need 15:15, 15:21, 26:6, 26:16, 56:14 needs 50:10, 50:11, 52:6 neither 244:10 never 32:14, 45:17, 46:13, 47:9, 60:4, 63:8, 63:17, 69:12 new 18:1, 18:2 next 12:16, 33:7 nitaac 23:18 no-go 28:19, 59:1 none 60:8, 66:4 nor 244:11 north 2:7, 3:5 not 7:15, 9:8, 9:17, 10:2, 10:3, 10:9, 12:5, 14:6, 14:7, 20:19, 22:22, 23:14,	27:9, 27:12, 28:17, 29:4, 29:18, 29:20, 32:7, 32:9, 35:18, 36:14, 37:19, 39:1, 40:15, 40:17, 41:18, 42:5, 42:15, 44:1, 44:15, 44:20, 45:11, 46:12, 46:21, 48:6, 52:21, 54:11, 54:15, 55:6, 55:12, 55:14, 56:22, 57:2, 57:3, 57:22, 58:15, 59:18, 59:21, 60:2, 60:7, 61:20, 62:19, 63:21, 65:5, 65:18, 66:7, 66:13, 68:9, 69:5 notarial 244:15 notary 2:17, 244:1, 244:20, 244:22 nothing 6:5 notice 2:15 november 31:17 now 9:5, 16:1, 22:5, 30:6, 30:18, 32:18, 34:1, 36:18, 38:1, 38:3, 39:20, 43:11, 46:20, 47:5, 49:1, 51:12, 52:8, 53:20, 54:2, 55:10, 58:13, 62:19, 66:9	number 10:14, 13:22, 15:6, 15:11, 21:9, 28:12, 30:12, 35:7, 38:12, 40:20, 42:19, 45:4, 45:15, 55:22, 60:2, 63:3, 244:22 <hr/> O <hr/> o'clock 67:19 oath 7:20 obtaining 11:10 obvious 7:10 obviously 28:7, 41:14 occasion 69:15 occur 47:19 october 5:4 off 28:21, 34:11, 242:6 offer 33:18, 35:17, 35:18, 35:20, 35:21, 64:12, 64:18 offhand 19:18 office 26:1 officer 9:3, 9:7, 30:8, 47:1, 68:16, 244:4 offices 2:1 often 17:10, 34:20
most 11:11, 27:13, 30:14, 37:9, 37:14, 40:1, 40:14, 42:15, 42:17, 50:1, 51:3, 57:8, 58:4 mostly 21:14, 29:15, 37:11, 61:16 motivate 67:5 move 59:10 much 37:12, 56:8, 60:4, 60:6, 69:5 muddled 38:2 multi-award 21:12, 21:20 multiple 24:8, 54:9, 56:9 myself 69:6 <hr/> N <hr/>			
naics 31:10 name 6:11, 6:12, 7:3, 11:18, 20:20, 22:10, 22:12, 24:5, 68:2, 68:17 named 58:1			

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

259

oftentimes 16:16, 17:19, 26:8, 32:10, 34:13, 38:12, 38:19, 47:14, 50:5, 58:22 oh 18:13, 56:6, 64:16, 65:4 okay 7:1, 7:7, 7:14, 7:18, 8:7, 9:9, 10:5, 10:12, 11:15, 12:6, 12:19, 12:22, 13:7, 13:18, 15:9, 17:7, 23:1, 23:4, 23:17, 24:1, 26:14, 28:4, 29:16, 29:17, 29:19, 30:1, 30:3, 30:9, 31:1, 31:4, 31:13, 33:6, 34:6, 35:15, 35:18, 36:17, 37:7, 40:11, 41:2, 41:17, 43:10, 44:19, 45:11, 46:4, 48:2, 48:5, 48:11, 48:14, 48:22, 49:9, 49:12, 50:5, 51:12, 51:13, 52:3, 54:10, 55:19, 56:16, 56:21, 57:13, 58:18, 59:15, 59:19, 61:4, 61:7, 61:10, 61:17, 62:14, 64:3, 66:4, 68:4, 68:8, 69:20 once 21:3	one 7:15, 10:2, 14:5, 14:12, 14:15, 14:18, 14:21, 15:7, 16:17, 20:12, 20:15, 21:12, 27:2, 27:15, 27:21, 28:7, 28:10, 30:16, 33:21, 38:6, 38:10, 38:11, 39:8, 41:14, 43:18, 47:2, 50:1, 54:10, 55:5, 55:8, 55:10, 55:13, 55:14, 55:20, 56:17, 57:6, 57:8, 57:12, 58:13, 60:2, 61:20, 62:13, 62:15, 63:20, 64:20, 64:22, 66:10, 67:1, 67:15, 69:3 one-page 62:22 ones 30:16, 60:7, 62:20 only 12:2, 13:19, 14:5, 19:5, 25:11, 31:8, 48:17, 50:6, 50:9, 50:15, 51:18, 55:19, 56:17, 58:3, 61:20, 65:5, 65:13 onward 65:20, 66:2 open 27:11, 27:13, 28:4, 28:6, 29:3, 29:8, 29:16, 29:17,	29:18, 29:20, 30:1, 30:3, 30:5, 30:6, 30:12, 30:14, 32:19, 32:21, 49:19 operating 9:3, 9:7, 38:9, 52:16, 68:16 operational 10:14, 38:6, 38:20, 53:3, 55:7 operations 37:22, 52:15 opportunities 11:1, 11:2, 11:3, 12:3, 12:4, 12:8, 12:9, 12:11, 12:15, 13:12, 14:1, 14:3, 14:4, 14:5, 15:1, 15:2, 16:16, 17:9, 17:17, 18:13, 19:21, 20:1, 21:10, 22:7, 30:13, 32:19, 33:4, 37:2, 38:4, 38:18, 39:17, 39:20, 40:10, 40:17, 40:19, 40:21, 41:7, 42:12, 42:21, 43:7, 43:12, 43:14, 44:7, 44:13, 44:17, 44:22, 45:15, 46:1, 46:2, 46:11, 47:5, 49:22, 57:14, 64:14, 65:16, 65:19, 67:4, 67:6, 67:13 opportunity 12:16, 13:15,	13:16, 13:19, 14:10, 15:13, 15:19, 16:4, 16:15, 16:21, 18:2, 18:6, 18:18, 21:7, 21:8, 29:6, 30:15, 32:3, 32:15, 32:20, 33:7, 33:9, 34:1, 35:16, 37:8, 38:21, 41:12, 43:2, 46:13, 46:18, 46:20 ora 48:2, 48:7, 49:7, 49:8, 54:22, 55:3, 57:2, 57:6 order 26:5, 28:16 orderly 7:18 orders 25:21, 25:22 originally 57:6 other 9:6, 9:15, 18:6, 25:6, 31:14, 33:15, 35:20, 39:5, 41:4, 42:6, 44:14, 45:2, 45:4, 47:4, 47:19, 48:19, 62:8, 63:1, 64:10, 64:12, 65:15, 67:7 others 15:11, 28:11, 39:16, 39:19, 41:4, 41:5 otherwise 244:13 our 19:3, 19:22,
---	--	--	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

260

20:6, 20:9, 21:19, 22:3, 22:4, 29:1, 31:9, 31:10, 31:16, 40:4, 41:8, 42:15, 42:16, 42:17, 42:20, 46:7, 47:7, 49:18, 51:10, 54:15, 56:14, 57:13, 63:10, 64:21, 64:22, 66:18, 68:16, 69:19 ourselves 11:5, 11:7, 64:10 out 18:17, 19:20, 19:21, 20:8, 21:7, 21:18, 26:5, 26:14, 31:15, 34:1, 34:12, 34:22, 37:16, 39:10, 41:11, 42:22, 53:5, 55:21 outcome 244:13 outside 66:14 over 7:15, 10:20, 40:11, 42:17, 43:6, 60:1, 62:10, 62:13 own 19:3, 45:14, 53:5, 54:15	paid 41:21, 41:22 paper 50:7, 50:10, 50:17, 63:2, 63:5 papers 62:18 parent 26:1 part 15:3, 17:7, 19:11, 21:17, 22:21, 37:1, 37:18, 40:14, 41:22, 42:5, 52:4, 58:21, 66:19, 67:20 part-time 48:15 particular 15:12, 15:21, 16:21, 17:16, 19:11, 21:7, 21:12, 21:18, 22:7, 31:3, 33:8, 35:16, 36:2, 46:18, 47:21, 50:16, 56:13, 63:20, 64:6 parties 244:12 partly 55:8 partner 22:4, 45:16, 58:3, 64:22 partners 34:1, 45:13, 61:20, 64:11 parts 24:9 partway 51:4 passed 51:18, 63:14, 63:15	passing 37:15 past 25:18, 26:4, 26:17, 27:13, 30:12, 40:4, 46:10 paste 56:21 patent 23:20 pattern 17:19 pay 53:7, 67:21 pays 44:1 pbx 23:19 people 15:15, 19:13, 35:20, 36:11, 36:12, 38:14, 38:21, 39:11, 42:20, 53:13, 69:5 percent 42:17, 48:16, 48:18, 48:19, 49:3, 49:5, 53:17, 53:19 percentage 37:12 perform 11:3, 15:21, 41:20, 47:13, 56:7 performance 25:18, 26:4, 26:17, 35:8, 47:11 performed 56:2 performing 47:12, 49:5 period 12:17, 43:6 periods 68:21	permanently 66:13 person 37:3, 37:6, 54:4, 54:5, 68:2 personal 63:19, 65:1 personnel 36:13, 52:15 perspective 18:4, 31:6, 35:14, 40:12, 41:16, 47:22, 56:13, 56:22, 57:1 peter 3:11, 7:3 phase 17:4, 62:21 phippis 44:17 phrasing 61:9 pick 27:2, 54:13 piece 15:4 pillars 14:18, 14:21 pinghu 61:11, 61:14, 63:13 pipeline 4:8, 4:11, 43:10, 43:11, 43:13, 66:19, 66:20, 66:21, 67:2, 67:8, 67:10, 68:4, 68:6, 68:7, 69:19 place 37:19, 57:16 plaintiff 1:6, 3:2 please 49:18 pllc 2:6, 3:4
P			
pac 61:11, 61:12 page 4:2, 4:6 pages 1:21, 35:7, 56:6, 63:3			

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

261

plug 59:9 point 40:4, 49:4, 55:5, 58:19 points 42:16 pool 28:2, 28:8, 28:21 portion 70:4, 242:5 portions 5:12 position 9:2, 35:2, 39:7 positioned 32:8 positioning 11:5, 11:7, 11:8 positions 9:6, 45:6, 45:7 possibilities 16:17 possible 16:15, 26:20, 60:8 potential 32:22, 33:22, 39:1, 39:9, 39:12 potentially 49:20, 67:12 practice 46:7, 46:8, 46:9, 61:19 prasad 45:7 preamble 40:14 predictor 18:11 predominant 12:20 predominantly 13:10, 29:11, 29:14	prepare 55:14, 55:17, 68:4 prepared 32:11, 59:20, 59:22, 68:6, 68:7 preparing 58:14 preselected 25:9 preselects 25:1 present 8:20, 60:21, 60:22 presently 8:7 president 9:5, 9:7, 9:16, 9:20, 10:3, 10:7, 10:13, 53:4 presumably 29:1, 55:20 presume 25:22 presumption 18:16 pretty 59:22 previous 68:16 price 26:13, 26:16, 27:1, 27:3, 55:19, 56:12 primary 43:18, 48:11, 48:13, 48:15, 48:16, 49:16, 67:15 prime 22:1, 22:3, 31:11, 31:12, 31:17, 31:18, 31:19, 32:4, 32:13, 33:16,	57:22, 58:1 principle 47:21 prior 49:4, 59:11, 59:16, 68:12 prioritization 66:21 prioritize 67:3 private 12:4, 12:8, 12:14, 14:10 probability 34:17, 60:6, 61:8, 63:21 probably 11:11, 21:16, 23:19, 30:13, 37:11, 40:20, 58:10, 58:14, 66:5 procedure 14:2 proceedings 244:4, 244:7 process 16:1, 17:3, 17:8, 25:16, 26:9, 33:8, 34:11, 58:22, 66:18, 66:19 products 22:19, 40:6, 40:8, 46:21 professional 2:17, 244:3 program 22:21, 52:9, 52:11, 52:20, 52:22, 53:2, 53:9, 53:21, 54:8, 54:14, 54:18, 54:19, 55:2 progressed 63:8, 63:17 project 53:2, 53:21,	54:5, 54:7, 54:10, 54:11, 54:14, 54:19, 54:20, 54:21, 55:2, 55:4, 55:5 projects 54:10 proposal 11:4, 25:16, 29:4, 34:9, 34:11, 36:16, 36:19, 56:20, 57:5, 57:19, 58:5, 58:22, 59:17, 61:13, 62:16, 62:22, 63:6, 63:10, 65:12 proposals 11:4, 11:12, 28:13, 28:17, 28:18, 28:22, 34:21, 55:15, 57:1, 57:2, 57:11, 60:1, 60:10, 60:18, 61:2, 61:4 proposer 39:1 protest 22:5 protests 27:17 provide 24:16, 31:4, 31:5 pseudo-governmen- tal 61:17 public 2:17, 36:5, 244:1, 244:20 publish 39:13 published 21:10 publishes 17:13
---	---	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

262

pull 59:9, 63:6	R	recalling 20:19	remember 19:18, 21:12,
pure 66:15	race 56:18	recent 37:10, 37:14,	24:11, 40:16,
pursuant 2:15	raise 38:18	50:1, 51:3, 57:8	50:20, 52:12,
pursue 16:18, 33:19,	randolph 2:6, 3:4	recently 29:13	58:6, 62:12,
49:20, 64:4,	randomly 54:13	recollect 58:12	67:18, 68:21
64:5, 64:8	rank 26:22	recompete 17:18, 35:1	reorganizing 9:13
pursued 13:22, 14:10,	reached 14:6	recompetition 18:18	rephrase 7:6
21:9, 40:20,	read 243:3	record 242:6, 244:6	report 4:8, 4:11, 68:7
57:15	reading 244:9	redacted 1:13	reported 1:22, 11:16
pursuing 14:2, 49:22	ready 17:18	reduce 28:12	reporter 2:16, 2:17,
pursuit 14:22	real 49:5	reduced 244:8	7:10, 7:17,
put 47:5, 47:6,	really 15:7, 16:8,	refer 11:20	244:1, 244:3
51:15, 51:17,	17:3, 20:6,	references 53:1	reports 68:5
51:22, 57:16,	29:21, 32:2,	referring 12:1	represent 7:3
58:4, 69:21	46:6, 46:13,	refused 42:4, 45:4,	request 56:5
putting 41:3	46:17, 48:8,	69:13	requested 244:10
Q	53:4, 53:5,	registered 2:16, 244:3	require 44:20, 65:3
quad 62:21	54:21, 56:14,	registration 244:22	required 44:16, 44:19
qualified 24:15, 25:1,	58:3, 65:18	regular 65:21, 66:6,	requirement 45:18
27:22	reason 31:8, 39:12,	66:11, 68:12,	requires 19:8
qualify 23:4, 23:9,	46:5, 51:9,	68:14	resale 40:6
24:12, 24:16,	66:10	regularly 67:20	resource 19:8, 38:15
28:7, 29:3	reasonable 56:11	related 244:11	resources 33:1, 33:3,
question 7:5, 13:2,	reasons 7:10, 37:19,	relationship 65:1	35:2
13:4, 13:6,	38:11, 58:20,	relationships 61:21	respect 9:8, 15:12
15:12, 41:1,	66:10, 69:3	released 34:15	respond 34:14, 65:2
44:9	recall 8:2, 46:20,		responded 58:11, 58:12
questions 7:11, 7:16,	51:19, 55:3,		response 45:9, 45:19,
70:1	55:6, 55:8,		
quicker 26:8	59:18, 59:21,		
quickly 26:22, 27:2	60:7, 61:2,		
	62:12, 68:10		

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

263

57:19, 58:15, 59:17, 62:15 responses 62:13, 62:17 responsibilities 53:3, 54:9, 67:1 responsibility 39:17, 41:5, 42:11, 42:13, 43:19, 43:22, 44:12, 53:12, 53:15, 55:7 responsible 47:22, 48:3, 48:9, 52:13, 52:14, 55:11 rest 48:9, 59:7 reston 3:15 result 22:3, 33:4, 41:18, 43:4 return 33:4, 34:16 revenues 31:9 reviewing 66:20 right 8:18, 9:9, 9:19, 10:18, 11:12, 13:19, 21:1, 22:5, 22:9, 23:4, 27:21, 29:7, 49:10, 51:20, 54:1, 57:13, 59:11, 61:7, 65:16, 65:20 roger 3:13 role 37:1 roughly 66:9 rpr 1:22	S said 15:16, 17:5, 31:6, 31:20, 33:10, 34:5, 38:10, 49:17, 49:18, 50:1, 50:9, 52:5, 52:13, 63:11, 65:1, 65:4, 65:9, 67:9, 69:13, 244:7 sales 40:9 same 18:4, 18:6, 36:8, 243:4 sanitation 14:18 saw 64:9 say 10:6, 10:14, 10:15, 11:9, 12:19, 15:6, 16:12, 17:21, 18:2, 18:3, 18:7, 18:13, 18:14, 19:11, 21:5, 21:7, 21:11, 25:6, 26:14, 26:21, 29:13, 31:15, 33:1, 36:1, 36:3, 36:5, 37:9, 39:1, 39:12, 40:3, 41:15, 41:18, 42:9, 42:16, 43:13, 43:18, 44:18, 45:5, 45:17, 45:19, 46:5, 46:10, 47:6, 47:22, 48:8, 53:1, 54:7, 54:20, 55:10, 55:13,	56:20, 58:4, 59:4, 59:9, 61:7, 61:15, 62:16, 63:18, 64:16, 66:3, 66:4, 66:8, 69:10, 69:17 saying 12:2, 13:9, 27:18, 29:10, 32:9, 40:14, 44:5 says 54:18 sbir 49:12, 49:13 schedule 22:18, 23:12 seal 244:15 seaport-e 23:14 second 12:12, 48:16, 51:2, 64:21 secondary 49:17 secretary 56:20, 57:11 sector 12:4, 12:8, 12:14, 14:10 security 62:8, 65:6, 65:7 see 10:2, 15:17, 17:3, 17:5, 18:9, 18:12, 36:2, 39:11, 49:1, 50:10, 60:12 seeing 22:6 seek 23:5, 23:10 seemed 62:10, 62:11	seen 27:4, 65:18 segmented 37:20 segments 19:7 select 28:8 selective 32:18 send 21:3, 39:10 sends 56:4 sense 32:3, 38:16 sent 27:6 separate 47:6 september 4:13, 51:7, 51:13, 51:14, 51:16, 51:17, 52:8 service 23:21 services 22:19, 22:20, 40:2, 40:9, 40:12, 40:13, 40:16, 42:15, 42:17 set 25:1, 30:21, 32:22, 54:9, 244:14 setaside 22:21, 27:15, 27:19, 27:20, 29:11, 31:16 setasides 23:2, 30:2, 30:4 seven 23:20, 24:10 sewp 23:18
--	---	--	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

264

shared 42:13 she 45:3, 52:11, 52:20, 52:21, 53:1, 53:8, 53:10, 53:11, 53:17, 53:19, 69:13 she's 69:21 sheet 243:7 shiplett 3:3, 13:1 shoot 32:1 short 43:6 shorter 40:9 shorthand 2:16, 244:1, 244:2 should 7:14, 24:2, 33:19, 39:14, 48:19, 55:10, 55:13 shouldn't 16:8 show 16:20, 55:18, 69:16, 69:20 side 25:6, 40:2, 40:13, 40:16 signature 243:11 signature-gi5ij 244:16 signed 243:7 significant 14:6, 14:8, 53:11, 53:14 significantly 34:18	signing 244:10 similar 10:10, 24:21 simpler 25:16 since 10:20, 55:12, 67:14, 68:6, 68:9 sir 6:9 sit 16:19 site 20:13, 21:11, 30:18, 49:6, 50:12 sites 17:10, 69:8 sitting 34:22 six 23:19, 24:10 size 40:11 skills 64:6 skype 5:2 slid 36:19 slightly 41:1, 44:9 small 11:6, 19:5, 38:11, 38:12, 47:18, 54:14 smaller 28:2, 28:21, 37:12 softball 56:4 sold 40:6, 40:8 sole 46:14, 55:15 solicitation 18:17, 26:11,	34:12, 34:13, 34:15, 34:22, 39:13, 54:1, 54:17, 56:5 solicitations 27:6 solicited 25:14 solution 26:7, 26:15, 26:21, 35:10, 35:14, 36:1, 36:3, 36:6, 36:10, 36:14, 55:18, 59:5, 59:6, 64:10 solutions 27:2 solves 36:7 some 6:19, 11:8, 12:17, 19:2, 21:3, 24:2, 24:4, 25:17, 26:9, 27:4, 28:11, 28:22, 31:9, 33:15, 39:19, 39:21, 40:4, 42:3, 42:4, 42:5, 46:11, 47:19, 53:6, 53:10, 55:9, 55:14, 58:19, 59:4, 61:19, 62:5, 62:8, 62:22, 67:7, 67:8, 69:9, 69:20, 69:22 somebody 41:12, 46:15, 46:16, 55:21, 66:17, 67:21 something 16:10, 16:13, 16:17, 20:21, 23:22, 30:21,	36:7, 41:18, 43:8, 47:2, 49:13, 49:14, 59:10, 63:4, 64:16 sometime 52:18, 62:1 sometimes 16:1, 25:15, 28:14, 32:20, 34:11, 35:6, 43:5, 47:17, 54:13, 59:3, 59:8, 59:9, 66:6, 66:7 somewhat 34:4 sorry 12:21, 22:11, 59:13 sort 33:7, 62:5, 66:21 source 18:19, 46:14, 55:15 space 27:11, 27:19, 27:20, 29:8, 29:12, 29:14, 29:17, 34:19, 41:19, 61:15 spawar 23:19 speak 7:6 speaking 45:21 special 30:10 specific 18:21, 18:22, 22:14, 36:10, 44:12, 60:7 specifically 40:3 speculation 60:19
---	--	---	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

265

speculative 43:14 spend 32:11 spending 32:12 spent 13:11, 48:20, 62:2 spotty 66:3 srini 39:22, 40:18, 52:2, 52:14, 53:1, 53:14, 69:6 srinivas 11:19 staff 11:2, 67:5 stage 14:6, 14:8, 17:18 stars 23:18 start 8:9, 28:21, 34:14, 59:2, 59:3, 61:19 started 8:16, 21:21, 31:8, 36:20, 40:5, 61:13, 67:18, 68:10 starting 51:6 state 12:9, 12:10, 12:11, 14:3 statement 35:8 states 1:1 stenographically 244:8 step 33:7 steps 34:9	still 14:6, 22:5, 27:14, 27:15, 30:2, 50:4, 50:10 stop 69:2 straining 23:20 strategies 11:9 strategy 33:12, 33:13, 33:14, 34:6, 35:11, 35:12 street 2:7, 3:5, 38:14 strike 44:4 structural 18:4 structure 18:8 structuring 9:13 stuff 50:13, 64:13 sub 33:17 subcontractor 32:4, 40:1, 45:13 subcontractors 33:22 submit 58:20, 59:16, 59:18, 62:21 submitted 57:19, 57:21, 58:15, 59:21, 60:9, 60:17, 61:5, 62:13, 63:9 subscription 20:22 substantial 56:8 success 42:1, 45:22	successful 22:2 such 15:2, 26:12, 26:19, 29:5 suitable 26:4 suite 3:14 supply 22:18, 23:12 support 58:16, 62:4 sure 8:14, 9:17, 10:2, 10:3, 10:9, 12:13, 23:14, 24:10, 52:21, 59:22, 60:2 sworn 6:4 <hr/> T <hr/> tactics 35:15 take 7:10, 7:11, 7:17, 27:16, 33:20, 42:8 taken 244:5, 244:7 takes 33:8 talk 7:15, 17:1, 39:5, 67:6, 67:11 talked 31:22 talking 11:5, 15:14, 15:17, 16:2, 33:11 target 65:17 task 25:21, 44:19,	56:20, 62:5 tasked 41:5, 44:11, 44:18 tasks 45:20 team 22:3, 34:2, 34:7 teamed 21:13 teaming 21:21, 33:14 teams 11:9, 22:1 technical 36:14, 36:16, 58:16, 62:4 technically 8:16, 26:13, 26:21, 27:1, 56:11 technologies 1:5, 4:20, 8:8, 62:9, 64:12 technology 16:20, 22:19, 58:2 tell 7:21, 13:20, 19:22 ten 63:4 tend 34:20, 54:6 tending 56:15 tenure 13:20 term 36:2 terms 30:20, 30:21, 31:3 testified 6:6 testify 6:4, 8:5
---	---	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

266

testimony 243:4, 243:5 th 244:15 than 9:7, 35:6, 36:4, 41:4, 42:6, 44:14, 45:2, 47:4, 50:21 thank 6:10 that's 10:16, 12:22, 18:5, 18:20, 22:6, 27:7, 27:17, 29:20, 30:10, 36:22, 45:18, 45:19, 47:19, 47:20, 50:9, 50:22, 59:15, 60:19 their 25:12, 26:1, 26:2, 30:7, 34:21, 35:2, 42:5, 67:13 them 15:7, 16:22, 19:15, 23:15, 24:2, 24:4, 24:5, 24:14, 27:14, 28:12, 28:20, 31:4, 32:5, 32:16, 35:21, 38:9, 38:17, 44:1, 55:18, 65:12, 69:9 then 8:20, 10:4, 10:6, 16:3, 16:18, 17:20, 18:1, 18:5, 18:12, 18:15, 18:20, 19:12, 19:14, 20:17, 21:21, 25:5,	25:20, 26:16, 26:22, 28:21, 29:5, 30:21, 33:3, 33:11, 33:12, 34:15, 38:22, 41:22, 43:7, 43:13, 43:15, 45:10, 46:19, 47:1, 47:14, 48:18, 48:19, 49:13, 49:14, 50:3, 50:19, 51:1, 51:15, 51:18, 51:19, 52:20, 54:20, 55:20, 56:3, 56:18, 59:4, 59:8, 63:1, 63:4, 63:5, 63:6, 64:17, 69:1, 69:22 theory 28:6 there 8:9, 12:6, 15:11, 16:13, 17:11, 18:17, 19:9, 19:12, 20:17, 22:4, 22:9, 22:14, 23:2, 23:15, 24:10, 25:8, 27:17, 28:10, 30:15, 30:19, 33:18, 34:8, 38:3, 39:15, 39:21, 40:17, 40:18, 42:9, 42:16, 43:5, 43:7, 43:8, 43:15, 43:20, 44:3, 44:10, 46:19, 48:6, 48:14, 49:3, 49:14, 50:2, 52:22, 53:20, 55:1, 55:8,	57:18, 60:8, 61:12, 64:15, 65:2, 65:21, 66:6, 68:12, 68:21 there's 15:15, 15:16, 17:12, 18:2, 18:15, 18:20, 23:19, 30:17, 33:10, 33:12, 35:9, 35:10, 56:17, 59:4 thereafter 244:8 these 18:9, 22:6, 23:5, 24:1, 24:12, 25:4, 25:17, 26:10, 27:4, 27:22, 37:1, 37:8, 38:20, 39:10, 40:1, 42:21, 55:15, 67:7, 67:8, 67:10, 67:18, 69:8, 69:12, 69:16 they 16:10, 20:1, 20:2, 21:2, 21:10, 24:7, 25:2, 25:18, 25:22, 26:5, 26:6, 26:7, 26:20, 26:22, 27:16, 28:1, 28:13, 28:21, 31:21, 32:7, 32:14, 34:13, 35:1, 35:2, 35:3, 35:4, 35:5, 38:17, 39:10, 39:12, 41:10, 41:17, 42:6, 43:2, 43:8, 43:9, 43:12, 47:15,	47:17, 54:3, 54:4, 54:12, 55:19, 55:20, 55:21, 56:7, 56:10, 56:11, 57:11, 61:20, 61:21, 63:1, 63:2, 63:5, 63:11, 63:17, 64:7, 64:15, 65:3, 65:12, 68:18 they'll 21:5, 21:6, 21:11, 26:14 they're 25:19, 34:22, 40:11, 56:10 thing 16:22, 20:4, 28:19, 32:5, 32:10, 39:5, 50:9, 65:3, 66:22 things 14:19, 17:13, 20:8, 20:10, 21:4, 33:14, 33:15, 36:9, 38:10, 39:8, 39:10, 43:1, 43:14, 47:19, 49:19, 49:20, 55:10, 55:13, 66:16, 67:7 think 11:10, 20:2, 20:15, 20:18, 21:3, 23:21, 24:5, 28:14, 34:20, 35:3, 36:4, 36:6, 37:14, 39:19, 40:4, 48:17, 48:22, 51:8, 53:22, 54:6, 57:10, 58:21, 61:8, 61:16,
---	--	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

267

65:13 thinking 39:20, 44:19, 58:14 third 63:14 this 7:4, 9:21, 9:22, 13:14, 13:19, 14:4, 14:12, 15:17, 16:20, 16:22, 17:2, 18:10, 18:13, 19:3, 19:19, 20:4, 21:6, 21:7, 21:11, 21:15, 21:18, 26:3, 29:1, 32:6, 33:13, 33:15, 33:16, 33:17, 33:19, 34:4, 34:10, 35:4, 35:11, 35:13, 35:16, 37:4, 37:17, 38:3, 39:4, 39:5, 40:14, 41:19, 43:17, 48:22, 50:6, 50:8, 50:20, 51:1, 51:3, 51:5, 53:4, 54:6, 54:11, 55:8, 56:7, 56:18, 58:6, 58:18, 59:8, 59:9, 61:22, 62:19, 63:11, 63:18, 64:17, 65:3, 65:5, 66:10, 66:15, 66:17, 68:2, 242:4, 244:12, 244:15 those 11:11, 14:5, 18:12, 20:1, 25:11, 27:1,	30:21, 31:13, 32:18, 36:11, 36:12, 40:21, 41:9, 47:4, 49:22, 52:15, 52:17, 56:1, 57:10, 60:3, 63:16, 67:4, 67:5, 69:1 though 10:10, 30:17, 50:14, 53:3 thought 58:12 three 9:18, 27:6, 27:9, 62:17 through 15:14, 20:22, 25:3, 47:10, 51:4, 62:20, 66:5 throughout 11:15 tied 34:4, 67:16 time 7:4, 10:20, 11:15, 12:7, 12:17, 12:20, 13:10, 13:11, 25:13, 29:7, 37:13, 41:9, 42:8, 43:6, 48:14, 49:11, 50:2, 50:11, 50:15, 50:17, 52:8, 57:15, 57:18, 59:7, 60:16, 63:14, 63:15, 64:3, 69:15 times 16:7, 33:19, 37:14 title 9:8, 10:11, 54:16	titles 54:15, 57:4 tobacco 46:21 today 7:4, 8:5, 9:4 together 16:6, 58:4, 62:6, 62:7, 67:17 told 32:15, 50:3, 50:14, 53:8 too 31:5 took 63:15 tool 43:11, 43:12 top 54:3, 54:5 total 62:17 toward 18:14, 18:16, 51:20 traditionally 31:10 transcript 4:5, 70:8, 244:6 transcription 243:5 treated 53:13, 53:14 tried 44:2, 45:18, 68:14, 68:17, 69:7 tries 28:8, 67:22 trouble 25:3 true 12:5, 50:22, 62:19, 243:4, 244:6 truth 6:5, 6:6, 7:21	try 19:2, 19:15, 28:22, 33:21, 49:21, 67:20 trying 16:19, 20:6, 67:4 tswg 58:13, 58:17, 59:13, 62:3, 62:20 tuesday 1:17 twice 63:14 twisted 64:21 two 9:17, 26:22, 27:6, 47:4, 47:13, 57:21, 60:3, 61:1, 64:20, 65:13, 66:8, 68:22 two-person 65:11 type 24:17, 25:2, 45:7 types 31:13, 67:7 typewriting 244:9 typically 27:12, 54:12 <hr/> U <hr/> uh-huh 44:8, 58:10 under 7:20, 8:1, 23:3, 23:5, 23:9, 23:10, 27:22, 29:18, 68:16, 244:9 underneath 24:8 understand 7:5, 7:7, 7:20,
--	--	--	---

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

268

16:9, 44:5, 60:12 understanding 15:15, 16:15, 52:18 unique 33:18, 39:6 united 1:1 unless 30:9, 40:11 until 13:1, 16:9, 32:15, 66:9, 68:18 upped 51:8, 51:9 use 17:15, 56:14, 60:1 used 29:15, 31:7, 43:11, 61:9 uses 28:14, 28:15 using 28:9, 50:4 usually 15:19, 16:14, 18:1, 26:12, 29:2, 29:5, 31:18, 31:19, 43:7, 47:19, 54:15, 58:20	34:9, 40:19, 67:9, 69:17 vast 27:14 vector 21:13 vehicle 23:3, 23:9, 23:10, 24:1, 25:4, 25:13, 25:19, 25:20, 26:18, 27:5, 27:8, 28:9, 29:11, 29:14, 29:19, 29:20, 30:19 vehicles 23:5, 23:8, 23:11, 23:15, 24:13, 28:1, 29:22 vendor 39:2, 55:20 vendors 18:2, 25:5, 39:12, 56:9 verbal 7:9 very 19:7, 25:6, 25:7, 26:22, 27:2, 38:12, 43:4, 43:19, 45:11, 54:13, 57:5, 64:15, 66:9, 66:11 veteran 21:16, 21:17 veterans 21:5 vha 21:14, 21:15, 39:22 viable 59:5 virginia 1:2, 1:16, 2:8, 2:18, 3:6, 3:15,	244:21 virtue 26:2 visit 16:19, 34:2 visiting 16:8 <hr/> W <hr/> wait 13:1 want 16:11, 20:3, 38:17, 64:4, 64:8, 64:13 wanted 48:10, 64:5, 64:7, 64:13, 65:7, 69:3 wants 35:4 washington 2:7, 3:5 wasn't 10:6, 48:9, 48:12, 69:4 waste 59:7 water 12:17, 13:14, 14:12, 14:15, 14:17, 14:20 way 36:19, 39:5, 42:15, 47:7, 47:15, 52:4, 53:13, 54:11, 59:4, 59:6, 65:10 ways 19:14, 28:7 we'd 69:2 we'll 39:13, 70:2 we're 11:6, 27:14, 28:18, 32:12,	35:17, 35:18, 39:3, 54:1, 56:15, 56:16 we've 12:9, 12:14, 19:17, 20:5, 27:4, 27:8, 37:20, 43:17, 44:2, 44:15, 45:8, 45:17, 59:21, 59:22, 66:9, 66:11, 68:14, 69:7 web 42:22 website 20:18, 20:20, 21:2, 21:18, 22:8, 22:14, 37:18 websites 17:11, 30:15 week 21:3 weekly 66:11, 67:2 well 12:12, 20:12, 21:14, 24:20, 28:16, 29:17, 30:14, 32:6, 32:8, 33:10, 34:1, 34:8, 34:12, 39:15, 42:8, 43:21, 44:2, 44:4, 45:21, 45:22, 47:13, 48:14, 54:22, 56:3, 59:22 went 10:13, 10:15, 62:20 were 8:15, 9:10, 9:11, 9:19, 10:18, 21:10, 21:19, 26:3,
<hr/> V <hr/> va 21:15 value 33:19 value-added 40:5 var 40:7, 40:8 various 15:14, 17:10, 17:21, 19:14, 20:7, 21:3,			

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang

Conducted on February 6, 2018

269

27:9, 29:19, 31:11, 37:5, 38:4, 40:17, 40:18, 41:5, 42:6, 42:14, 42:16, 42:18, 42:20, 44:10, 45:5, 50:14, 52:17, 52:22, 56:8, 57:10, 57:11, 57:12, 57:22, 58:3, 58:14, 60:8, 61:5, 63:1, 63:21, 64:7, 64:14, 64:21, 65:12, 65:16, 68:12, 244:4, 244:7 weren't 38:3, 40:21 what 6:11, 9:1, 9:4, 9:10, 10:8, 10:18, 16:10, 16:12, 18:10, 18:11, 22:15, 22:17, 23:11, 24:2, 24:4, 24:19, 32:6, 33:7, 33:17, 34:4, 35:3, 35:14, 35:16, 36:4, 37:5, 37:15, 37:16, 38:17, 39:20, 42:6, 44:5, 45:9, 45:19, 48:11, 52:20, 53:15, 60:20, 61:9, 61:10, 62:10, 62:11, 64:7, 64:17, 65:3, 67:8 what's 11:18, 19:15, 68:2 whatever 36:5, 56:21,	65:14 whatnot 17:22 wheelhouse 20:9 when 8:9, 8:16, 9:1, 9:9, 9:16, 10:12, 17:20, 18:12, 25:19, 25:20, 27:6, 27:7, 30:6, 32:11, 33:6, 34:10, 36:1, 36:2, 36:19, 39:15, 41:15, 42:16, 44:18, 48:14, 49:3, 50:11, 54:16, 55:16, 56:17, 58:6, 60:20, 61:7, 62:1, 66:4, 67:18, 67:22, 68:10, 69:16 where 8:7, 12:6, 12:7, 17:15, 17:17, 19:2, 19:18, 19:20, 19:21, 21:11, 22:1, 24:6, 26:9, 26:11, 27:8, 34:2, 43:21, 51:14, 54:2, 62:21, 64:9, 64:14, 64:15, 67:8, 67:9, 68:22 whereas 28:4 whereof 244:14 whereupon 6:2 whether 53:7, 55:12 which 11:4, 14:1,	14:5, 14:6, 15:16, 18:21, 19:14, 21:22, 22:5, 23:8, 25:2, 25:7, 26:8, 26:13, 28:11, 29:1, 29:16, 30:5, 30:10, 33:4, 33:11, 38:22, 40:8, 40:13, 40:16, 41:10, 41:12, 46:21, 54:9, 54:13, 57:3, 57:6, 57:9, 60:7, 62:3, 62:4, 62:18, 62:22, 63:3, 63:15, 64:9, 64:14, 64:20, 65:16, 66:8 while 68:15 white 62:18, 63:2, 63:5 who 12:1, 22:1, 25:11, 32:4, 41:9, 45:5, 45:8, 45:13, 51:22, 67:10, 67:21, 69:7 whole 6:5, 31:20, 56:16 whom 244:4 whose 22:10, 22:12, 68:17 why 19:4, 19:19, 25:2, 38:11, 39:14, 50:7, 50:8, 61:7 wide-eyed 16:11	wife 36:5 will 12:1, 20:9, 25:10, 29:3, 35:21, 47:15, 54:14 willing 45:12 win 11:7, 14:7, 29:4, 30:21, 38:8, 41:13, 47:10, 54:16, 58:21, 60:5 winning 34:17, 38:8, 41:17, 41:19 wired 47:9 wish 46:6, 48:6, 48:8 with 6:19, 6:21, 7:15, 7:16, 9:8, 10:19, 11:5, 11:9, 11:15, 12:7, 13:10, 15:11, 16:13, 19:10, 21:13, 24:17, 27:3, 28:1, 28:21, 29:7, 31:1, 31:2, 31:20, 32:21, 33:21, 33:22, 38:22, 39:9, 41:5, 43:18, 44:11, 45:11, 46:11, 48:4, 48:18, 54:10, 56:9, 56:16, 57:15, 58:1, 60:17, 61:10, 63:20, 63:22, 64:3, 65:2, 66:17, 67:5, 67:11
--	--	---	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

270

within 26:10, 27:5, 38:14, 42:10, 66:21, 67:13 witness 13:3, 13:7, 244:14 won 39:21, 39:22, 40:2, 40:15 word 28:15 words 31:14, 64:10 work 8:7, 8:8, 8:21, 20:3, 25:2, 26:5, 33:22, 35:6, 35:8, 41:17, 41:21, 48:13, 49:21, 56:22, 57:2, 65:13 worked 8:11, 41:10, 50:2, 58:18, 58:19 working 21:21, 34:14, 58:17, 62:4, 67:4 works 45:8 worse 10:9 would 8:1, 8:5, 10:14, 10:15, 15:6, 15:8, 16:5, 16:18, 18:7, 25:6, 29:13, 31:10, 31:14, 31:15, 31:18, 32:4, 32:7, 36:6, 36:16, 37:9, 38:8, 39:3, 40:3, 41:12,	42:16, 42:19, 42:22, 43:5, 43:7, 43:8, 43:9, 43:12, 43:13, 43:15, 45:5, 45:17, 45:19, 46:5, 47:6, 48:22, 49:2, 50:5, 51:1, 51:2, 51:5, 51:6, 51:19, 53:1, 54:7, 56:7, 58:4, 58:16, 58:21, 58:22, 59:3, 60:1, 60:4, 60:20, 63:2, 63:5, 63:6, 63:18, 65:17, 65:20, 66:3, 66:6, 66:7, 66:8, 67:10, 67:11, 67:17, 68:22, 69:1, 69:9, 69:10, 69:11, 69:14, 69:17 wouldn't 41:15, 60:6, 61:15, 69:16 write 56:6, 65:11 written 34:21 <hr/> X <hr/> xyz 21:6 <hr/> Y <hr/> yeah 11:14, 23:11, 41:8, 58:10, 59:13, 65:4 year 6:17, 10:2, 48:17, 49:3, 50:1, 50:19,	50:21, 51:1, 51:11, 58:7 years 9:18, 17:21, 27:10, 27:16, 37:10, 47:13, 66:4, 66:5, 66:8 yes 6:15, 7:8, 7:13, 7:19, 7:22, 8:19, 8:22, 11:13, 11:17, 11:22, 12:14, 13:13, 14:12, 15:5, 20:14, 20:19, 22:16, 23:7, 24:14, 24:18, 28:3, 29:9, 37:3, 42:2, 44:21, 50:22, 53:19, 56:10, 57:20, 60:11, 60:19, 60:22, 61:3, 61:6, 64:5, 65:9 you're 7:20, 15:20, 16:2, 25:21, 27:18, 32:21, 33:3, 34:10, 44:5, 47:12, 50:6, 54:18, 54:20, 55:17, 56:6, 60:13, 60:14 you've 12:7, 15:22, 30:20, 42:9, 57:18, 60:16 your 6:11, 7:11, 7:16, 9:10, 10:12, 10:18, 11:15, 13:10, 13:20, 15:12, 16:8, 23:16, 26:6, 26:7,	26:17, 29:7, 34:16, 37:1, 45:19, 46:8, 47:11, 47:12, 49:19, 56:3, 57:15, 63:5, 64:3 yourself 16:3, 39:16, 44:14, 65:22 <hr/> \$ <hr/> \$25 54:3 <hr/> 0 <hr/> 00 67:19 0000002 4:19 0000005 4:19 0007690 4:12 0007691 4:12 0007724 5:5 0007728 5:5 00123 4:16 00412 1:7 0060034 4:22 0060047 4:22 0068626 4:9 0068638 4:9 008787 5:3 010858 4:17 <hr/> 1 <hr/> 1:18
---	---	--	--

CONFIDENTIAL INFORMATION REDACTED

Transcript of Eli Liang
Conducted on February 6, 2018

271

10 5:6 100 25:10, 43:6, 49:5, 53:17, 53:19 11 62:1, 67:19 11260 3:13 115 4:14 117 4:17 119 4:19 12 244:15 124 4:22 13 4:14 14 4:13 15 63:4 17 1:7, 4:16 174865 1:20 18 242:6 196 5:3 1:cv 1:7 <hr/> 2 <hr/> 20 62:13 200 28:18 201 3:14 2011 8:10, 8:18, 8:19, 10:20, 37:10, 39:15,	42:9, 44:10, 57:7, 60:21, 60:22, 65:20, 66:1 2012 4:13, 4:14, 5:4 2013 40:5, 66:5, 66:6 2014 10:6, 10:7, 37:11 2015 10:8, 31:16, 51:13, 52:19, 68:13 2016 4:7, 4:10, 9:19, 42:10, 44:10, 51:3, 51:7, 51:14, 51:17, 52:8, 52:19, 66:9, 67:14, 68:6, 68:9, 68:11, 68:12 2017 9:21, 51:3, 51:17, 51:21, 57:9, 58:8, 58:9, 58:11, 59:11, 59:16, 61:2, 61:5, 64:20 2018 1:17, 9:22, 10:1, 10:2, 18:15, 18:16, 244:16, 244:18 20190 3:15 203 5:5 21 34:13 215 5:9 22046 2:8, 3:6	24 62:14 242 5:13, 70:5 244 1:21 252 2:7, 3:5 26 51:7, 51:13, 51:14, 51:16, 51:17 <hr/> 3 <hr/> 3 5:13, 70:5 30 34:13 3039 2:9, 3:7 31 244:18 318 3:16 <hr/> 5 <hr/> 50 25:10, 42:17, 48:16, 48:18, 48:19, 49:3 53 1:18 <hr/> 6 <hr/> 652 2:9, 3:7 6800 3:16 <hr/> 7 <hr/> 7 242:6 70 4:9, 5:13, 22:15, 23:12, 70:4 703 2:9, 3:7, 3:16	7060756 244:22 78 4:12 <hr/> 8 <hr/> 8(a) 23:18, 30:9, 31:1, 31:15, 31:16 <hr/> 9 <hr/> 9 5:13, 70:4 96 4:13 <hr/> < <hr/> <- 70:9
---	--	--	---